

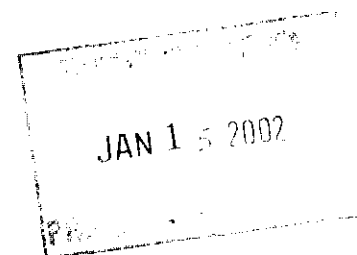


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January 15, 2002

VIA HAND DELIVERY



BOSTON

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NEW YORK

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PHILADELPHIA

PRINCETON

WASHINGTON

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency,
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Lower Darby Creek Area Superfund Site
Response to 104(e) Request for Information

Dear Ms. Prisk:

On behalf of our client, News America Incorporated, we are submitting the enclosed response to the 104(e) request sent to "TV Guide Magazine." We have identified one other source of potentially responsive information, which source we intend to investigate over the next few weeks. We will update the enclosed response as necessary based on the results of that investigation.

Please direct any related questions or communications to my attention.

Very truly yours,

John M. Ix

JMI/rc

Enclosures

cc: Jan F. Constantine, Esq. (w/ encl.)
Lois Kimbol, Esq. (w/o encl.)

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RESPONSE OF NEWS AMERICA INCORPORATED
TO EPA'S 104(E) REQUEST DATED NOVEMBER 6, 2001
FOR LOWER DARBY CREEK AREA SUPERFUND SITE

1. State the name of your company, its mailing address, and telephone number. Further identify:
 - a. The dates and states of incorporation of your company;
 - b. The date and original state of incorporation of your company; and
 - c. The parent corporation of your company, if any, and all subsidiaries or other affiliated entities.

EPA's 104(e) request was sent to "TV Guide Magazine." During the time period referenced in the 104(e) request, 1958 to 1976 (hereinafter the "Relevant Period"), TV Guide magazine was published by Triangle Publications, Inc. ("Triangle"). During the Relevant Period, TV Guide was not a separately incorporated entity. Triangle was incorporated in Delaware on December 6, 1940.

In 1988, after the Relevant Period, The News Corporation Limited ("TNCL"), through its various subsidiaries, purchased Triangle. On May 25, 1989, Triangle changed its name to News America Publications Inc. ("NAP"). In March 1999, TNCL merged NAP with United Video Satellite Group, Inc. ("USVG") in exchange for an approximate 44% equity interest in USVG. Following this, USVG changed its name to TV Guide, Inc. and NAP changed its name to TV Guide Magazine Group, Inc. In July 2000, TV Guide, Inc. merged with Gemstar International Group Limited, which then changed its name to Gemstar-TV Guide International, Inc. As a result of these transactions, TV Guide Magazine Group, Inc. became an indirect subsidiary of TV Guide, Inc. and TV Guide, Inc. became a direct subsidiary of Gemstar-TV Guide International, Inc.

2. What is the current nature of the business or activity conducted at your establishment(s) in the Philadelphia, Pennsylvania area? What was the nature of your business or activity between 1958 and 1976? Please describe in detail. If the nature of your business or activity changed from the period of 1958 to 1976 to the present, please provide a detailed explanation of the changes to date.

Between 1958 and 1976, the TV Guide operating unit of Triangle operated from four locations in the Philadelphia, Pennsylvania area.

- a. **Broad & Callowhill, Philadelphia, PA: administrative/office services associated with the publication of TV Guide magazine (1954 to 1958).**

b. 250 King of Prussia Road, Radnor, PA: administrative/office services associated with the publication of TV Guide magazine (1958 (?) to 1980). These operations were moved to 100 Matsonford Road, Radnor, PA in 1980.

c. 12 S. 12th Street, Philadelphia, PA: advertising services associated with the publication of TV Guide magazine. It is believed these operations occurred at this location from December 1, 1971 until some time after 1976.

d. 440 N. Broad Street, Philadelphia, PA: gravure printing of TV Guide magazine by the printing division of Triangle. These operations ceased in 1977 or 1978.

Currently, administrative/office services associated with publishing TV Guide magazine occur at 100 Matsonford Road, Radnor, PA. No printing occurs at that location. TV Guide has no other location in the area.

3. Identify all persons currently or formerly employed by your establishment(s) who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976 at your facilities in the Philadelphia, Pennsylvania area. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.

The following people were/are employed by Triangle and/or its successors and may have such knowledge:

a. Richard Winfield, Building Manager, 1958 to 1996 [REDACTED]

b. Richard Julason, Director of Facilities, 1997 to present (100 Matsonford Road, Radnor, PA (610.293.8507))

c. Brian Bradfield, General Manager and Vice President, ~ 1953 to ~ 1989 (address/phone number unknown)

d. Thomas O'Mara, Assistant to Business Manager, later Manager of Office Facilities, 1954 to early 1980s [REDACTED]

e. John Sheehan, General Manager (address/phone number unknown)

f. Peter Abel, Esq., Attorney, ~ 1972 to ~ 1992 [REDACTED]

- g. Vincent Ohanyan, Chief Financial Officer/Senior Vice President, ~ 1991 to present, (100 Matsonford Road, Radnor, PA (610.293.8907))**
 - h. Amadeo Pantoni, employee at 440 N. Broad Street (address/phone number unknown)**
 - i. David Cutler, Plant Manager, 1960 to 1971 (address/phone number unknown)**
 - j. Charles DiNardo, employee at 440 N. Broad Street (address/phone number unknown)**
- 4. Identify the owners and operators of your establishment(s) in the Philadelphia, Pennsylvania area from 1958 to the present. For each owner and operator further provide:**
- a. The dates of their operation;**
 - b. The nature of their operation; and**
 - c. All information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which they were operating the establishment(s).**

See response to question No. 2

- a. Broad & Callowhill, Philadelphia, PA: Owners unknown. TV Guide's administrative operations here would only have generated non-hazardous office waste.**
- b. 12 S. 12th Street, Philadelphia, PA: Leased site, PSFS Building, owners unknown. TV Guide's advertising services here would only have generated non-hazardous office waste.**
- c. 250 King of Prussia Road, Radnor, PA: This facility was owned by Triangle. TV Guide's administrative operations here would only have generated non-hazardous office waste.**
- d. 440 N. Broad Street, Philadelphia, PA: This printing facility was owned by Triangle until December 27, 1979. The facility generated small amounts of ink waste sludge, which was hand-shoveled into 55-gallon drums. The waste consisted of the ink left behind on the presses and rollers in the printing process. The ink was non-toxic, and OSHA did not**

require testing of it. The sludge also contained extremely small amounts of solvent waste which was halothanes, heptane, hexane, xylene 7 and laxtol. Beginning in 1975, and continuing for approximately 1-2 years, toluene was used. After that, the facility switched back to the heptane/hexane composition. The solvent portion of the sludge was extremely small due to a very effective solvent recovery system which recovered and recycled 98% of all solvents used in the process. The solvent recovery system is described by John Sheehan and David Cutler in the attached deposition testimony (Exhibit A).

e. 100 Matsonford Road, Radnor, PA: This facility is owned by The Rubenstein Co., L.P., 4100 1 Commerce Square, 2505 Market Street, Philadelphia, PA 19103. TV Guide's administrative operations here would only have generated non-hazardous office waste.

5. Describe the types of documents generated or maintained by your establishment(s) in the Philadelphia, Pennsylvania area concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.
 - a. Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents;
 - b. Describe any permits or permit applications and any correspondence between your company and/or establishment(s), and any regulatory agencies regarding the transportation and disposal of such wastes; and
 - c. Describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such wastes.

No such TV Guide records have been located.

6. Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify:
 - a. The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;
 - b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance;

- c. The annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled;
- d. The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled;
- e. The types and sizes of containers in which these substances were transported and stored; and
- f. The persons or companies that supplied each such hazardous substance to your company.

Hazardous substances were not used, generated, purchased, stored, or otherwise handled at the Broad & Callowhill, 12 S. 12th Street and 250 King of Prussia Road facilities. See the response to question no. 5 with respect to 440 N. Broad Street.

- 7. Identify all by-products and wastes generated, stored, transported, treated, disposed of released, or otherwise handled by your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. With respect to each such by-product and waste identified, further provide:
 - a. The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;
 - b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;
 - c. The annual quantities of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled;
 - d. The types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;
 - e. The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and
 - f. The location and method of treatment and/or disposal of each such by-product or waste.

Only office wastes were generated, stored or otherwise handled at the Broad & Callowhill, 12 S. 12th Street and 250 King of Prussia Road facilities. No wastes were treated, disposed

of or released at those facilities. See response to question no. 5 with respect to 440 N. Broad Street.

8. Did your company ever contract with, or make arrangements with Clearview, Folcroft, Folcroft Annex, Eastern Industrial, Tri-County Hauling, S. Buckly Trash Hauling, Barratt Rupurt, McCloskey Engineering, ABM Disposal Services, Marvin Jonas, Jonas Waste Removal, Paolino Company, Schiavo Bros., Inc. and/or any other company or municipality to remove or transport material from your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976 for disposal? If so, for each transaction identified above, please identify:
- a. The person with whom you made such a contract or arrangement;
 - b. The date(s) on which or time period during which such material was removed or transported for disposal;
 - c. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
 - d. The annual quantity (number of loads, gallons, drums) of such material;
 - e. The manner in which such material was containerized for shipment or disposal;
 - f. The location to which such material was transported for disposal;
 - g. The person(s) who selected the location to which such material was transported for disposal;
 - h. The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal or transportation of such material; and
 - i. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material.

Jonas removed waste ink sludge from 440 N. Broad Street in 55 gallon drums. The ultimate destination of that waste is not known. However, the Jonas Registration Statement for 1974 (Exhibit B) lists disposal sites. Jonas records from 1970 through 1976 (Exhibit C) reflect that Jonas removed approximately 441 drums in 1970, 493 drums in 1971, 733 drums in 1972, 1,071 drums in 1973, 1,125 drums in 1974, 976 drums in 1975 and 813 drums in 1976. According to the deposition testimony of David Bumbaugh, a driver for Jonas, in the matter of N.J.D.E.P. v. Gloucester Environmental Management Services,

Inc. (D.N.J. No. 84-0152), he only picked up two to four full drums and 30 to 40 empty drums when he picked up waste from Triangle (Exhibit D). According to the deposition testimony of John Sheehan and David Cutler, formerly of Triangle, in the matter of **U.S. v. Rohm & Haas Company**, (D.N.J. No. 85-4386), Jonas picked up empty drums from the facility (Exhibit A). The estimated quantity of waste ink sludge, therefore, is approximately 2,426 gallons in 1970, 2,712 gallons in 1971, 4,032 gallons in 1972, 5,891 gallons in 1973, 6,186 gallons in 1974, 5,368 gallons in 1975, and 4,472 gallons in 1976. However, 14,608 gallons of this waste have already been allocated to the GEMS Superfund matter for years 1971 through 1974 and 34,585 gallons have been allocated to the Jonas Transfer Station matter for years 1970 through 1978.

Jonas also sold drums to Triangle (See Exhibit C, entries coded 6,000 or 7,000).

We have not identified any record of a contract or arrangement with any of the other entities listed in Question number 8 for removal or transportation of material during the Relevant Period.

9. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:
 - a. Disposed of or treated materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site;
 - b. Arranged for the disposal or treatment of materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site; and/or
 - c. Arranged for the transportation of materials to Clearview, Folcroft and Folcroft Annex or other areas of the Site (either directly or through transshipment points) for disposal or treatment.

None known.

10. For every instance in which your establishment(s) disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify:
 - a. The date(s) in which such material was disposed of or treated at the Site;
 - b. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
 - c. The annual quantity (number of loads, gallons, drums) of such material;

- d. The specific location on the Site where such material was disposed of or treated; and
- e. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's or establishment's(s') possession regarding arrangements made to dispose of or treat such material at the Site.

No known disposal or treatment at Clearview, Folcroft or Folcroft Annex of material from TV Guide's facilities.

11. Did your establishment(s), or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the site? If so, identify the following:
- a. The date(s) the spill(s)/release(s) occurred;
 - b. The composition (i.e., chemical analysis) of the materials which were spilled/released;
 - c. The response made by you or on your behalf with respect to the spill(s)/release(s); and
 - d. The packaging, transportation, and final disposition of the materials which were spilled/released.

None of the entities identified in response to question no. 1 spilled or caused such a release. We have no knowledge of any other company or individual having done so.

12. Please identify individuals employed by your establishment(s) who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions at your Philadelphia, Pennsylvania area establishment(s) between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same persons identified by your answer to question 3, so indicate.

As to Broad & Callowhill, Philadelphia, PA: Nobody we interviewed had responsive information.

As to 250 King of Prussia Road, Radnor, PA: Richard Winfield.

As to 12 S. 12th Street, Philadelphia, PA: Nobody interviewed had responsive information.

As to 440 N. Broad Street, Philadelphia, PA: Unknown.

13. Did you or any person or entity on your behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site? If so, please provide all documents pertaining to such assessments or investigations.

No.

14. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, telephone number, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

None.

15. Representative of your establishment(s):

- a. identify the person(s) answering these questions on behalf of your establishment(s), including full name, mailing address, business telephone number, and relationship to the company.
- b. Provide the name, title, current address, and telephone number of the individual representing your establishment(s) to whom future correspondence or telephone calls should be directed.

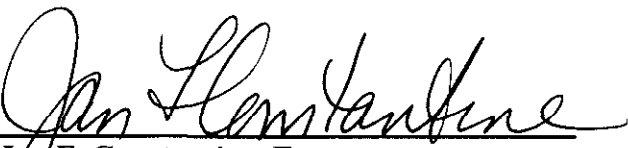
The person who gathered the information in response to these questions is John M. Ix, Esq., attorney for News America Incorporated. Information was provided by the persons identified in the response to Question No. 3, subparts a, b, d, f and g. The person who has

signed this response is Jan F. Constantine, Executive Vice President and Senior Deputy General Counsel of News America Incorporated.

Future correspondence or telephone calls should be directed to: John M. Ix, Esq., Dechert, 4000 Bell Atlantic Tower, 1717 Arch Street, Philadelphia, PA 19103 (215.994.2995).

16. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:
- a. Your document retention policy;
 - b. A description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
 - c. A description of the type of information that would have been contained in the documents; and
 - d. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Documents related to waste disposal (from the Broad & Callowhill, 12 S. 12th Street, and 250 King of Prussia Road facilities) by the TV Guide operating unit of Triangle between 1958 and 1976 have not been located. It is believed that such records would not have been kept more than 7 years from creation. The documents would likely have been comprised of contracts (if any) with haulers of TV Guide's office waste, invoices from such haulers, and records of payments to such haulers. Documents related to waste disposal from 440 N. Broad Street have not been located, nor has information about such records been provided by those interviewed.


Jan F. Constantine, Esq.

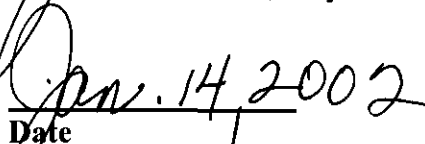

Date

Exhibit A

Sur
R. M. ...

UNITED STATES OF AMERICA,

5

JOHN SHEEHAN

6

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1 INFORMATION WITH RESPECT TO THE DISPOSAL OF THE
2 SLUDGE WASTE AND THE OPERATION OF THE NEUTRALIZER?

3 A. NO.

4 Q. I THINK WE LEFT OFF OPERATIONALLY WITH THE
5 ETCHING OPERATION. WHAT WAS THE NEXT OPERATIONAL
6 ASPECT YOU WERE GOING TO DESCRIBE TO US?

7 A. THE PRESS OPERATION.

8 Q. AND WHAT DID THE PRESS OPERATION DO?

9 A. DURING THE PRESS OPERATION THE IMAGES THAT
10 WERE ETCHED ON THE PRINTING CYLINDERS WERE
11 TRANSFERRED BY THE USE OF INK ONTO THE TRAVEL OF A
12 PAPER WEB ON THE PRINTING PRESS.

13 Q. NOW, DID THAT PARTICULAR PROCESS GENERATE
14 ANY WASTE?

15 A. PLENTY. IT WAS THE -- THE WASTE GENERATED
16 WAS PAPER WASTE.

17 Q. AND WHAT OTHER KINDS?

18 A. AND EVENTUALLY A SLUDGE OF SPENT, THAT IS,
19 USED INKS.

20 Q. DO YOU KNOW WHAT THE COMPOSITION OF THE INKS
21 WAS AT THAT TIME?

22 A. THE CHEMICAL COMPOSITION?

23 Q. YES.

24 A. NO.

25 Q. AND DID THAT PARTICULAR OPERATION GENERATE

1 ANY OTHER WASTE?

2 A. NO.

3 Q. DID IT GENERATE ANY SOLVENT WASTE?

4 A. WELL, SOLVENT WAS RECAPTURED -- BETWEEN 85
5 AND 90 PERCENT OF THE SOLVENT THAT WAS IN THE INK
6 AS IT WAS INTRODUCED INTO THE PRESS WAS RECAPTURED
7 THROUGH A RECOVERY SYSTEM WHICH SUCKED THE SOLVENT
8 VAPORS FROM A HOOD, AND BY USE OF A HOOD
9 IMMEDIATELY OVER THE PRINTING FOUNTAINS AND DREW
10 THOSE VAPORS INTO ABSORBER BEDS. THESE WERE HUGE
11 TANKS WITH CARBON AND THE SOLVENT WAS DISTILLED
12 BACK INTO A LIQUID FORM SO THAT WE DIDN'T CONSIDER
13 IT AS A WASTE, IT'S REALLY A HIGH PRODUCT, IN
14 EFFECT.

15 Q. AND WHAT WOULD HAPPEN TO THAT SOLVENT; WAS
16 IT IN A LIQUID FORM?

17 A. WE ACTUALLY RECOVERED MORE SOLVENT. LET ME
18 GO BACK JUST A STEP. WE PURCHASED INK, THE INK
19 DURING THIS PERIOD OF TIME WAS PURCHASED AND
20 DELIVERED IN DRUMS INITIALLY AND THEN EVENTUALLY
21 WAS -- AT SOME TIME DURING THE PERIOD WE INSTALLED
22 AN INK FARM WHICH CONSISTED OF A NUMBER OF HUGE
23 VATS SO THAT THE INK WAS DELIVERED IN BULK FORM
24 AND PUMPED INTO THE VATS, EACH VAT HAVING A
25 DIFFERENT COLOR OF INK. THAT INK WAS DELIVERED IN

20

1 A VERY VISCOUS FORM, AND IN ORDER TO USE THE INK
2 IN THE PRINTING OPERATION, IT HAD TO BE DILUTED
3 WITH A SOLVENT. THE SOLVENT THAT WE WOULD RECOVER
4 FROM THE PRESS OPERATION WAS USED TO DILUTE THE
5 INK -- REUSED TO DILUTE THE INK. THE INK AS IT
6 WAS DELIVERED ALSO HAD SOLVENT IN IT. NOW, AS I
7 SAY, WE RECOVERED 85 PERCENT OF THE SOLVENT BUT IN
8 THE OPERATION WE RECOVERED -- WE RECOVERED MORE
9 SOLVENT THAN WE ACTUALLY PUT INTO THE INK BECAUSE
10 SOLVENT WAS IN THE INK WHEN IT WAS DELIVERED TO
11 US.

12 Q. LET ME ASK YOU THIS QUESTION THEN: DID YOU
13 GENERATE ANY RESIDUAL OR WASTE SOLVENT?

14 A. YES, SOLVENT REMAINED IN THE INK THAT WAS
15 LEFT OVER AFTER THE PRINTING OPERATION.

16 Q. THEN, AND IF I HAVE THIS WRONG, PLEASE
17 CORRECT ME, THEN ANY SOLVENT THAT WOULD BE
18 CONSIDERED AN EFFLUENT OF YOUR PROCESS WOULD HAVE
19 BEEN MIXED IN WITH THE SPENT SLUDGE?

20 A. THAT'S RIGHT, THE SPENT INK AND THEN THE
21 RESIDUAL WAS THE SLUDGE.

22 Q. NOW, WITH RESPECT TO THE OPERATION OF THE
23 MACHINES OR PRINTING PRESSES, DID, AT ANY TIME,
24 YOU HAVE TO CLEAN THOSE MACHINES?

25 A. CERTAINLY.

21
24

1 Q. AND WHAT WOULD YOU USE TO CLEAN THOSE
2 MACHINES?

3 A. MY UNDERSTANDING IS THAT ONE OF THE
4 MATERIALS USED TO CLEAN THE PRESSES WAS SOLVENT.

5 Q. AND DO YOU KNOW WHAT HAPPENED TO THE
6 SOLVENTS WHICH WERE USED TO CLEAN THOSE MACHINES?

7 A. WELL, THERE WAS LEFTOVER SOLVENT, SOLVENT
8 THAT GOT TOO DIRTY TO USE TO BE EFFECTIVE IN THE
9 CLEANING OF THE PRESS, YES.

10 Q. WOULD THAT BE DISPOSED OF?

11 A. YES, IT WOULD.

12 Q. HOW OFTEN WOULD YOU CLEAN THE MACHINES?

13 A. THE PRESSES WERE CLEANED -- WERE SUPPOSED TO
14 BE CLEANED AFTER EACH PRESS RUN. THAT WASN'T
15 ALWAYS DONE AND THOSE CLEANINGS WERE PRIMARILY TO
16 GET THE SUPERFICIAL INK SPLATTERS AND OTHER CRUD,
17 SO TO SPEAK, OFF THE PRESSES. PROCEDURALLY THEY
18 WERE CLEANED THOROUGHLY DURING A DOWN TIME PERIOD,
19 WHICH OCCURRED ERRATICALLY THROUGHOUT THE YEAR.

20 Q. LET ME ASK YOU HOW MUCH WASTE SOLVENT WOULD
21 BE GENERATED BY THE CLEANING OF THE PRESSES ON A
22 WEEKLY BASIS?

23 A. I HAVE NO IDEA.

24 Q. CAN YOU ESTIMATE IT AT ALL?

25 A. NO, I CAN'T.

1 Q. CAN YOU ESTIMATE ON A DAILY BASIS?
2 A. NO.
3 Q. NOW, YOU TESTIFIED THAT YOU GENERATED THIS
4 SLUDGE WASTE AND CAN YOU TELL ME HOW THAT WASTE
5 WAS DISPOSED OF?
6 A. YES. TO MY KNOWLEDGE, THE WASTE WAS REMOVED
7 FROM THE PRINTING FOUNTAINS, FOUNTAINS WERE THE
8 CONTAINERS FOR THE INK, AND PUT INTO DRUMS. THE
9 DRUMS WERE OF SLUDGE OR SPENT INK OR THE CONTENTS
10 OF THE DRUMS WERE PUT INTO A DECANter TANK AND THE
11 PURPOSE OF THAT WAS TO DRAIN OFF AS MUCH OF THE
12 SOLVENT AS WAS POSSIBLE. THAT SOLVENT WAS THEN
13 PUT INTO A CONTAINER OF WHAT WE CALLED DIRTY
14 SOLVENT WHICH WAS THEN PUT INTO A NONCRITICAL
15 BLACK INK THAT WAS USED TO PRINT THE COMICS. THE
16 RESIDUE FROM THE DECANter OPERATION WAS PUT INTO
17 DRUMS FOR DISPOSAL.
18 Q. AND WHO WAS IN CHARGE OF DISPOSING THOSE
19 WASTES?
20 A. WELL, AGAIN, THAT WAS A FUNCTION OF THE
21 MANUFACTURING OPERATION UNDER MR. CUTLER.
22 Q. DO YOU KNOW WHO PICKED UP THOSE WASTES FROM
23 YOUR PLANT?
24 A. YES.
25 Q. AND WHO WAS THAT?

1 A. MARVIN JONAS.

2 Q. NOW, THAT WAS -- STRIKE THAT.

3 WITH RESPECT TO THE PHOTOGRAPHIC AND ETCHING

4 OPERATIONS, DID MARVIN JONAS ALSO PICK UP THAT

5 SLUDGE?

6 A. NO.

7 Q. HOW DO YOU KNOW THAT HE PICKED UP THIS

8 PARTICULAR WASTE, THAT IS, THE WASTE FROM THE

9 PRESS ROOM?

10 A. WELL, FROM A VARIETY OF ENCOUNTERS. NUMBER

11 ONE, UNDER MY JURISDICTION, WE PREPARED PURCHASE

12 ORDERS ADDRESSED TO MR. JONAS, IT WAS COMMON

13 KNOWLEDGE FOR THOSE OF US IN MANAGEMENT THAT JONAS

14 WAS USED TO TAKE AWAY THE EMPTY DRUMS, THE DIRTY

15 DRUMS. ALSO, WE PAID THE BILLS.

16 Q. DID YOU EVER DEAL WITH MARVIN JONAS

17 DIRECTLY?

18 A. I NEVER DID, NO.

19 Q. WHO DID DEAL WITH HIM?

20 A. I DON'T KNOW.

21 Q. WHAT WAS YOUR POSITION AT THE TIME THAT YOU

22 WERE SUPERVISING THE ISSUANCE OF PURCHASE ORDERS

23 FOR THE DISPOSAL OF WASTES FROM THE PRESS ROOM?

24 A. I WAS THE CHIEF ACCOUNTANT AT THAT TIME.

25 Q. AND HOW LONG HAD YOU HAD THAT JOB -- STRIKE

1 YOU SHIPPED THROUGH MR. JONAS ON A WEEKLY BASIS?
2 A. IN THE FIRST PLACE, WE DIDN'T SHIP ON A
3 WEEKLY BASIS. IT WAS ON AN AS-REQUIRED BASIS AND
4 I DON'T KNOW THE ANSWER TO THAT AS TO HOW MUCH WAS
5 SHIPPED AT ANY ONE TIME. VARYING AMOUNTS, THOUGH.
6 Q. MR. JONAS HAS TESTIFIED THAT IN HIS
7 DEPOSITION THAT HE TOOK APPROXIMATELY 80 BARRELS A
8 WEEK, 80 DRUMS A WEEK FROM TRIANGLE. IS THAT AN
9 ACCURATE CHARACTERIZATION OF THE AMOUNT OF WASTE
10 HE WOULD HAVE TAKEN FROM TRIANGLE, TO YOUR
11 KNOWLEDGE?
12 A. I THINK IT IS INACCURATE.
13 Q. AND WHY DO YOU SAY THAT?
14 A. WE DIDN'T GENERATE NEARLY THAT QUANTITY OF
15 WASTE.
16 Q. DO YOU HAVE A GENERAL IDEA OF HOW MUCH WASTE
17 YOU WOULD HAVE GENERATED WHICH WOULD HAVE BEEN
18 TAKEN BY MARVIN JONAS ON A WEEKLY BASIS?
19 A. AS I SAID, WE DIDN'T SHIP ON A WEEKLY BASIS.
20 Q. JUST GENERATED IN TERMS OF --
21 A. WELL --
22 Q. AN ESTIMATE IS FINE.
23 A. I WOULD RATHER ANSWER THAT QUESTION ON AN
24 AS-TAKEN BASIS, WHICH I THINK WOULD BE MORE IN THE
25 NEIGHBORHOOD OF A MONTHLY BASIS.

1 Q. FINE. PLEASE ANSWER THAT.

2 A. AND I WOULD SAY POSSIBLY AT THAT TIME AN
3 ESTIMATE CERTAINLY IS 20 TO 30 DRUMS.

4 MR. STOVIK: WHAT TYPE OF WASTE ARE
5 YOU REFERRING TO THERE?

6 THE WITNESS: I'M REFERRING TO THE
7 WASTE THAT'S IN THE SLUDGE DRUMS THAT WE'RE
8 SPEAKING OF.

9 MR. STOVIK: THE WASTE THAT JONAS
10 WOULD HANDLE?

11 THE WITNESS: THE WASTE THAT JONAS
12 WOULD HANDLE, YES.

13 BY MR. WOODS:

14 Q. DID YOU EVER HAVE OCCASION TO FIND OUT WHERE
15 MARVIN JONAS WAS TAKING THIS WASTE?

16 A. NO.

17 Q. DO YOU KNOW OF ANYBODY WHO MIGHT HAVE?

18 A. NO, I DO NOT. IN PREPARATION FOR THIS
19 DEPOSITION I TALKED TO A NUMBER OF PEOPLE WHO
20 POSSIBLY COULD HAVE KNOWN AND THEY ALL STATED THAT
21 THEY DID NOT KNOW.

22 Q. WHO DID YOU TALK TO?

23 A. MR. CUTLER, MR. FETTIG AND MR. DI NARDO.

24 Q. DID THEY KNOW OF ANYBODY WHO MIGHT HAVE
25 FURTHER KNOWLEDGE OF THE DESTINATION OF THOSE

1 WASTES?

2 A. NO ONE WHO WOULD ADD MATERIALLY TO WHAT THEY
3 SAID.

4 Q. DO YOU HAVE ANY KNOWLEDGE GAINED FROM
5 OUTSIDE OF THE COMPANY WHERE THESE WASTES MIGHT
6 HAVE BEEN DISPOSED OF? AND BY OUTSIDE OF THE
7 COMPANY I MEAN BEYOND THE SEARCH AND THE INQUIRIES
8 YOU MADE DURING YOUR RESPONSE TO THE SUBPOENA.

9 MR. STOVIK: I WOULD ALSO INSTRUCT
10 HIM NOT TO ANSWER IT IN TERMS OF ANYTHING THAT WAS
11 DISCLOSED TO HIM BY COUNSEL.

12 BY MR. WOODS:

13 Q. WELL, I CERTAINLY HAVE NO OBJECTION TO THAT
14 BECAUSE THAT WOULD CERTAINLY CONSTITUTE PRIVILEGED
15 INFORMATION, BUT OUTSIDE OF THAT INFORMATION OR
16 THAT WHICH WAS DISCUSSED WITH COUNSEL, DO YOU HAVE
17 ANY KNOWLEDGE OR ANY INFORMATION OF WHERE THESE
18 WASTES MIGHT HAVE GONE?

19 A. NO.

20 Q. DURING THE COURSE OF TRIANGLE'S BUSINESS
21 TRANSACTIONS WITH MARVIN JONAS, DID THE NAME
22 LIPARI LANDFILL EVER COME UP?

23 A. NO.

24 Q. DO YOU HAVE ANY KNOWLEDGE OF WHETHER ANY OF
25 MARVIN JONAS' WASTES WERE DISPOSED OF AT LIPARI

1 A. BY PHONE.

2 Q. WOULD YOU HAVE THEIR PHONE NUMBERS BACK AT
3 YOUR OFFICE?

4 A. I HAVE THEM HERE.

5 Q. WOULD YOU BE WILLING TO TELL ME THEIR PHONE
6 NUMBERS?

7 A. YES.

8 Q. COULD YOU PULL THEM OUT AND GIVE THEM,
9 PLEASE?

10 A. OKAY. CUTLER, [REDACTED]

11 Q. WHAT AREA CODE, PLEASE?

12 A. THAT'S THIS AREA -- OR [REDACTED] DI NARDO, I
13 HAVE TWO NUMBERS THROUGH WHICH YOU COULD REACH DI
14 NARDO. ONE IS WORK, 755-6000, AND I ASSUME THAT
15 THAT'S 215 AREA CODE.

16 Q. DO YOU KNOW WHERE HE WORKS?

17 A. REBADO EXPRESS.

18 Q. AND WHAT WAS THE SECOND NUMBER, PLEASE?

19 A. [REDACTED] NOW, THAT IS AREA CODE [REDACTED] AND
20 FEDDIG, [REDACTED]

21 Q. CAN YOU BRIEFLY DESCRIBE FOR ME THE PROCESS
22 BY WHICH SOLVENT WAS RECAPTURED? PARTICULARLY I
23 THINK YOU MENTIONED ABSORBER BEDS AND I'M NOT
24 FAMILIAR WITH WHAT YOU MEAN BY THAT. COULD YOU GO
25 BACK A STEP AND DESCRIBE TO ME THAT PROCESS?

1 A. SURE. I'LL GO BACK TO THE PRINTING
2 OPERATION FIRST, OKAY?
3 Q. OKAY.
4 A. INK IS DELIVERED TO US IN BULK FORM WHICH
5 WAS A VERY VISCOUS SUBSTANCE AND AS I SAID, THE
6 INK WAS ENTERED INTO PRINTING WELLS, INK WELLS WE
7 CALL THEM, INTO WHICH THE CYLINDERS REVOLVE WITH
8 THE ETCHING IMAGES ETCHED ON THEM, THEY WERE
9 LITTLE WELLS ON COPPER-PLATED MATERIAL AND AT HIGH
10 SPEEDS THE CYLINDER WOULD REVOLVE IN THIS WELL, IN
11 THESE INK TANKS, I SHOULD SAY, AND THESE LITTLE
12 WELLS WHICH YOU COULD HARDLY FEEL ON THE COPPER
13 PLATING WOULD PICK UP THE INK, THERE WAS A BLADE
14 THAT CAME AND WIPED OFF THE EXCESS INK FROM THE
15 SURFACE OF THE CYLINDER LEAVING ONLY THE INK IN
16 THESE LITTLE WELLS AND THE CENTRIFUGAL FORCE KEPT
17 THAT INK IN THERE UNTIL IT MET THE PAPER. THE
18 PAPER WAS TRAVELING THROUGH THE PRESS AND OVER THE
19 CYLINDERS AND, OF COURSE, THEN THE PAPER THAT'S IN
20 THESE LITTLE -- OR THE INK THAT'S IN THESE LITTLE
21 WELLS WOULD MEET THE PAPER AND BE ABSORBED BY THE
22 PAPER AND THIS HAPPENED EIGHT TIMES DURING THE
23 PRINTING PROCESS. THERE ARE FOUR COLORS, YELLOW,
24 RED, BLUE AND BLACK, AND FROM THOSE FOUR PRIMARY
25 COLORS EVERY OTHER SHADE OR GRADATION IS PRODUCED

1 BY THE IMPOSITION OF ONE IN CERTAIN DEGREES OR 60
2 OTHER ON THE OTHER. NOW, TO MAKE THE INK LESS
3 VISCOUS, A SOLVENT WAS INTRODUCED INTO THE
4 FOUNTAINS AND JUST THE ABSOLUTELY PROPER VISCOSITY
5 WAS NEEDED OR THE IMAGE WOULD BE DISTORTED IN ONE
6 WAY OR ANOTHER. SO THIS WAS MEASURED. NOW. THAT
7 MEANS THAT WE HAD SOLVENT COMING IN IN THE INK
8 ITSELF, THE ORIGINAL SHIPMENT, AND WE HAD SOLVENT
9 INTRODUCED. 85 PERCENT OF ALL THE SOLVENT -- 85
10 TO 90 PERCENT OF ALL THE SOLVENT THAT WAS USED IN
11 THE OPERATION, THE STUFF THAT WAS IN THE INK TO
12 BEGIN WITH AND THE STUFF THAT WAS ADDED WAS
13 RECAPTURED. WE'RE NOW AT THE POINT OF YOUR
14 QUESTION. THE WEB TRAVELS, AS I SAID, OVER THESE
15 INK FOUNTAINS AND OVER THE CYLINDERS THAT REVOLVE
16 IN THEM AND RIGHT ON THE TOP OF THE IMPRESSION
17 WHERE THE PAPER MEETS THE CYLINDER THERE WERE WHAT
18 WE CALLED OVENS WHICH ABSORBED INTO THE OVENS AND
19 THERE WERE FANS IN THERE AND IT ABSORBED, SUCTION
20 DEVICES WHICH CAPTURED THE VAPORS THAT THE SOLVENT
21 WAS GOING INTO VAPOROUS FORM, DREW IT UP INTO THE
22 OVENS AND THEN INTO THE ABSORBER TANKS AND THE
23 ABSORBER TANKS ARE HUGE, HUGE TANKS, I DON'T KNOW,
24 MUCH LONGER THAN THIS ROOM HERE AND I GUESS ABOUT
25 TEN OR 12 FOOT IN DIAMETER AND THERE WAS A BED OF

1 CARBON, AND THE FUNCTION WAS TO REDUCE THE VAPORS
2 THEN TO LIQUIDS AND THAT'S WHAT HAPPENED. THE
3 LIQUID WAS CAPTURED INTO SETTLING TANKS OR HOLDING
4 TANKS, WHATEVER, ALSO BIG, HUGE TANKS AND THAT WAS
5 THEN THE SOURCE OF OUR ADDITIVE SOLVENT FOR THE
6 NEXT PRINTING OPERATION.

7 Q. WAS THE RESIDUAL THAT WAS LEFT IN THE BOTTOM
8 OF THOSE TANKS THE RESIDUAL THAT YOU REFERRED TO
9 AS BEING PUMPED OUT BY SOME OTHER COMPANY?

10 A. THAT'S A DIFFERENT OPEATION ENTIRELY.
11 YOU'RE THINKING OF THE NEUTRALIZING SYSTEM NOW.

12 Q. WAS THERE ANYTHING LEFT AT THE BOTTOM OF THE
13 TANKS WHERE THE ABSORBER BEDS WERE?

14 A. NO, JUST A USED CARBON.

15 Q. AND WHAT HAPPENED THERE?

16 A. WELL, I THINK THAT MOST OF THAT WE KEPT IN
17 THERE AND WE ADDED ADDITIONAL CARBON TO MAKE THE
18 OPERATION FUNCTION. I'M NOT SURE WHETHER ANY OF
19 IT WAS EVER REPLACED ENTIRELY. I THINK IT WAS
20 MAYBE -- WE HAD THREE OR FOUR OF THESE ABSORBERS,
21 BUT MAYBE IN THE COURSE OF TIME MAYBE THE BEDS
22 WERE REPLACED ENTIRELY ONCE. I'M NOT CERTAIN OF
23 THAT, THOUGH.

24 Q. WOULD THERE HAVE BEEN ANY RESIDUAL ON THE
25 OVENS?

1 A. NO, NO.

2 Q. SO WHAT HAPPENED TO THE TEN OR 15 PERCENT OF

3 THE SOLVENT THAT WAS NOT RECOVERED?

4 A. IN THE AIR.

5 Q. THAT WAS THE VAPOR THAT WAS LOST?

6 A. YES. YOU WOULD SMELL IT AS SOON AS YOU --

7 YOU WOULDN'T HAVE TO BE IN THE PRESS ROOM TO SMELL

8 IT.

9 Q. I'M HANDING YOU WHAT WAS MARKED AS

10 GOVERNMENT'S EXHIBIT NUMBER THREE AND I SEE ON THE

11 RIGHT-HAND SIDE THERE'S TWO COLUMNS, ONE MARKED

12 PRICE, I BELIEVE, AND THE OTHER MARKED AMOUNT. DO

13 YOU KNOW WHAT UNIT WOULD HAVE BEEN REFERRED TO FOR

14 THE PRICE? FOR EXAMPLE, DO YOU KNOW WHETHER THAT

15 WOULD MEAN A PRICE FOR PER BARREL OR PER DRUM?

16 A. PER DRUM. SEE, ON THE LEFT-HAND COLUMN

17 THERE'S 12 ENTERED THERE. THAT MEANS THERE ARE 12

18 DRUMS.

19 Q. SO MULTIPLYING IT OUT THEN, 12 TIMES --

20 A. IT COMES TO 78 BUCKS.

21 Q. WAS THERE ANYONE IN CHARGE OF MAINTENANCE AT

22 THE GRAVURE PLANT WHO WOULD KNOW ANYTHING ABOUT

23 DISPOSAL OF WASTES THROUGH MARVIN JONAS?

24 A. I'VE ALREADY TESTIFIED AS TO THE THREE

25 PEOPLE THAT I FELT WOULD KNOW SOMETHING ABOUT IT.

1 I DON'T KNOW THAT -- I DON'T KNOW ANYONE ELSE WHO
2 WOULD KNOW ANY MORE ABOUT IT THAN WHAT HAS -- THAN
3 I'VE TESTIFIED TO TODAY. I JUST DON'T KNOW OF
4 ANYBODY ELSE.

5 Q. DO YOU REMEMBER THE NAME OF THE MAINTENANCE
6 SUPERVISOR OR MANAGER AT THE TIME, '60 THROUGH
7 '71?

8 A. YES, I REMEMBER THE NAME. HIS NAME IS BOB
9 SIMONS.

10 Q. DO YOU KNOW --

11 A. HIS JURISDICTION DIDN'T EXTEND TO THIS,
12 HOWEVER.

13 Q. WHAT WAS HIS JURISDICTION?

14 A. HIS JURISDICTION WAS MAINTENANCE.

15 Q. MAINTENANCE MEANING WHAT?

16 A. MAINTENANCE MEANING REPAIR AND UPKEEP.

17 Q. HAVE YOU EVER HEARD OF THE NAME ALMO OR ALMO
18 TANK CLEANING COMPANY?

19 A. NO.

20 MS. RELATION: I HAVE NO OTHER
21 QUESTIONS.

22 MR. WOODS: I JUST HAVE ONE MORE
23 QUESTION.

24 (EXAMINATION OF MR. SHEEHAN BY MR. WOODS:)

25 Q. JUST ONE ADDITIONAL QUESTION, MR. SHEEHAN.

1 IS THERE ANYTHING ELSE THAT'S RELEVANT TO
2 THIS MATTER THAT WE SHOULD KNOW ABOUT THAT YOU
3 HAVEN'T TOLD US SO FAR?

4 A. YES, I THINK SO.

5 Q. COULD YOU TELL US WHAT THAT IS?

6 A. YES, HAVING SPOKEN WITH CUTLER WHO IS A
7 CHEMIST BY ACADEMIC TRAINING AND WHO CAME UP
8 THROUGH THE RANKS OF THE LABORATORY, IN GOING OVER
9 THIS WITH HIM, HE ASSURED ME THAT THERE WAS
10 NOTHING CHEMICALLY IN THE MIX OF INKS OR INKS AND
11 SOLVENTS OR THE SLUDGE, THE RESIDUE, THAT IN HIS
12 OPINION OR IN THE OPINION OF PEOPLE THAT HE'S
13 WORKED WITH DOWN THROUGH HIS PRINTING CAREER THAT
14 WOULD REPRESENT A HAZARD IN ANY WAY TO THE HEALTH
15 OF ANY PERSON AND THAT FURTHER THAT WE, AS
16 MANAGERS OF THE PLANT, WERE NEVER, EVER AWARE OF
17 ANY RISK FACTOR AT ALL INVOLVED IN THE USE OF
18 PRESS INKS, AND I THINK THAT CUTLER IS A MAN THAT
19 SHOULD HAVE SOME KNOWLEDGE OF THAT AND THAT'S
20 SUPPLEMENTED BY OUR EXPERIENCES AND I THINK THAT
21 THAT SHOULD BE PART OF THIS.

22 MR. WOODS: I HAVE NO FURTHER
23 QUESTIONS.

24 (BRIEF RECESS.)

25 MR. STOVIK: I WOULD JUST LIKE TO

1 CLARIFY A COUPLE THINGS WITH YOU, MR. SHEEHAN. 87

2 (EXAMINATION OF MR. SHEEHAN BY MR. STOVIAK:)

3 Q. WHAT MATERIAL DID MARVIN JONAS HANDLE THAT
4 WAS MATERIAL FROM TRIANGLE PUBLICATIONS?

5 A. INK SLUDGE.

6 Q. AND DO YOU BELIEVE THAT MATERIAL WAS
7 HAZARDOUS?

8 A. I BELIEVE IT WAS NOT HAZARDOUS.

9 Q. AND IS THAT BECAUSE OF WHAT YOU TOLD US
10 ABOUT YOUR DISCUSSION WITH MR. CUTLER AND YOUR
11 EXPERIENCE?

12 A. YES, IT WAS MY DISCUSSION WITH MR. CUTLER
13 AND ALSO OUR EXPERIENCE.

14 Q. AND DID MR. JONAS HANDLE ANY SLUDGE FROM THE
15 NEUTRALIZATION PROCESS?

16 A. NO.

17 Q. DID MR. JONAS EVER HANDLE ANY SOLVENTS?

18 A. NOT THAT I'M AWARE OF.

19 MR. STOVIAK: I HAVE NOTHING
20 FURTHER. THANK YOU.

21 (WITNESS EXCUSED.)

22

23

24

25

JOHN SHEEHAN

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEW JERSEY

3 C.A. NO. 85-4386

4 UNITED STATES OF AMERICA,

5 PLAINTIFF,

ORAL DEPOSITION OF

6 VS.

DAVID CUTLER

7 ROHM & HAAS COMPANY,

(TRIANGLE PUB.)

8 DEFENDANT.

9 * * * * *
10 TUESDAY, SEPTEMBER 9, 1986
11 * * * * *

12 TRANSCRIPT IN THE ABOVE MATTER TAKEN
13 AT THE UNITED STATES ATTORNEY'S OFFICE, 4TH AND
14 MARKET STREETS, CAMDEN, NEW JERSEY, COMMENCING AT
15 3:00 P.M.

16 A P P E A R A N C E S:

17 JAMES C. WOODS,
18 ATTORNEY FOR THE UNITED STATES
19 ENVIRONMENTAL PROTECTION AGENCY

20 DECHERT, PRICE & RHOADS, ESQUIRES
21 BY: WENDY R. RELATION, ESQUIRE
22 ATTORNEYS FOR ROHM & HAAS COMPANY

23 DILWORTH, PAXSON, KALISH
24 & KAUFFMAN, ESQUIRES
25 BY: MICHAEL L. KRANCER, ESQUIRE

- AND -

MICHAEL C. CARTER, ESQUIRE
ATTORNEYS FOR TRIANGLE PUBLICATIONS
AND DAVID CUTLER

CERTIFIED SHORTHAND REPORTING SERVICES
ARRANGED THROUGH
MASTROIANNI & FORMAROLI, INC.

SUITE 310
2201 ROUTE 38
CHERRY HILL, NEW JERSEY 08002

MASTROIANNI & FORMAROLI INC.
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CUTLER - WOODS

1 SUPERVISE LINE PEOPLE.

2 Q. FINE. I WONDERED WHAT HE WAS TALKING
3 ABOUT.

4 NOW, LET'S FOCUS ON THE PERIOD BETWEEN 1960
5 AND '71. DURING THAT PERIOD, DID THE PLANT
6 PRODUCE ANY WASTES WHICH WERE DISPOSED OF OFF
7 SITE?

8 A. NOT TO MY KNOWLEDGE. OH, WAIT A MINUTE. I
9 HAVE TO CORRECT THAT. PAPER WASTES WHICH WERE
10 SOLD, THEY WERE SOLD TO VARIOUS VENDORS. IT COULD
11 HAVE BEEN -- THERE WAS WOOD, THE NORMAL WOOD,
12 PAPER. I'M SURE THERE WAS A TRASH CONTAINER THAT
13 WENT TO A DUMP. I AM SORRY. THAT WAS TOTALLY
14 WRONG WHAT I SAID ORIGINALLY. WOOD, THEY WOULD
15 SELL THE EXCESS, GIVE AWAY EXCESS CONTAINERS,
16 DRUMS, EXCESS, BUT THAT'S TO MY KNOWLEDGE.

17 Q. DO YOU HAVE KNOWLEDGE BESIDES THAT AS TO
18 WASTE THE PLANT PRODUCED?

19 A. YES.

20 Q. WHAT WERE THE OTHER WASTES THAT THE PLANT
21 PRODUCED THAT YOU LEARNED ABOUT?

22 A. WE HAD A WASTE PROGRAM WITHIN THE COMPANY TO
23 TAKE CARE OF ANY WASTES WHICH WERE DEEMED TO BE
24 HAZARDOUS.

25 Q. WHAT KIND OF WASTES WERE PRODUCED WHICH WERE

1 HAZARDOUS?

2 A. A WASTE SUCH AS AN ACID, SMALL QUANTITIES OF
3 SULFURIC ACID, VERY SMALL, SMALL QUANTITIES. WE
4 HAD A NEUTRALIZING SYSTEM, IF THEY WERE TO OCCUR,
5 BUT THEY ACTUALLY DIDN'T OCCUR.

6 Q. NOW, THE ACID AND WAS THERE RESIDUE FROM THE
7 NEUTRALIZING SYSTEM?

8 A. YES.

9 Q. HOW WOULD YOU DESCRIBE THAT?

10 A. IRON -- MAINLY AN IRON -- MAINLY IRON
11 MATERIALS.

12 Q. WOULD IT HAVE INCLUDED ANY SOLVENT OR
13 SOLVENT RESIDUES?

14 A. NO. EXCEPT A MERE INFANT -- THERE WOULD
15 HAVE TO BE SOME CONTAMINATION UNKNOWN TO SOMEONE,
16 BUT NOTHING WAS PIPED TO THE NEUTRALIZING SYSTEM,
17 OF THAT NATURE.

18 Q. THERE'S A LOT OF TESTIMONY -- HAVE YOU READ
19 MR. SHEEHAN'S DEPOSITION?

20 A. NO.

21 Q. I JUST WANT YOU TO KNOW I'M NOT TRYING TO
22 TRIP YOU UP ANYWHERE ALONG THE LINE. I CERTAINLY
23 DIRECT THAT TO MR. KRANCER AND MR. CARTER, BUT
24 THERE'S A LOT OF TESTIMONY IN HERE CONCERNING
25 SOLVENTS WHICH WERE THE AFFLUENT OF CLEANING

CUTLER - WOODS

1 PRINTING PRESSES AND WHICH MAY HAVE GOTTEN INTO
2 THE NEUTRALIZATION SYSTEM AND INTO THE RESIDUAL
3 SLUDGE MATERIAL. WOULD THAT BE ACCURATE?

4 A. THAT HAD NOTHING TO DO WITH THAT.

5 Q. WERE THEY SOLVENTS?

6 A. NO, THIS HAD NOTHING TO DO WITH THAT. THIS
7 WAS A SYSTEM, A NEUTRALIZING SYSTEM REGULATED BY
8 THE CITY OF PHILADELPHIA, TESTED BY THE CITY OF
9 PHILADELPHIA, ENFORCED BY THEM AND THE STATE, I
10 BELIEVE, AT THAT TIME.

11 Q. OKAY.

12 A. WHICH WAS RULED BY WHATEVER REGULATIONS AT
13 THAT TIME, TO NEUTRALIZE ANYTHING THAT MIGHT BE OF
14 ANY ACIDIC NATURE THAT GOES DOWN INTO A DRAIN, A
15 SEPARATE DRAIN WAS USED. IT DIDN'T GO INTO THE
16 CITY'S PIPES. IT WENT TO A SETTLING TANK, AND THE
17 MAIN REASON WAS THE FERRIC CHLORIDE, THE ETCHING.
18 THAT WAS REALLY THE REAL REASON, WAS THE FERRIC
19 CHLORIDE.

20 Q. SO, NOW, THE SLUDGE MATERIAL WAS PRODUCED, I
21 BELIEVE, YOU TESTIFIED, WAS AN IRON -- WHAT DID
22 YOU SAY?

23 A. SOME FORM OF IRON, SOME FORM OF IRON OXIDE.
24 I DON'T KNOW THE EXACT DERIVATION, WHAT IT WOULD
25 BE. WHEN NEUTRALIZED, THE FERRIC CHLORIDE, WHICH

CUTLER - WOODS

1 WAS THE ETCHING FOR THE ENGRAVED STONERS, IT WAS
2 NEUTRALIZED WITH A P.H. AND THEN THE SLUDGE
3 SETTLED OUT. SOME FORM OF IRON MAINLY, NONTOXIC.
4 IT WAS TESTED TO BE NONTOXIC.

5 Q. WHEN WAS IS IT TESTED?

6 A. AMAZINGLY, IT WAS THE CITY THAT WAS
7 MONITORING IT AT THAT TIME. HAVING BEEN PART OF
8 THE PHILADELPHIA INQUIRER GROUP AND THEY WERE
9 VERY, VERY KEEN TO THIS SITUATION, HAVING 18
10 UNIONS TO CONTEND WITH. WE WERE VERY KEEN TO THAT
11 SITUATION. SOLVENTS WERE NOT INVOLVED IN THAT.

12 Q. JUST ONE QUESTION CONCERNING THE SLUDGES
13 FROM THE NEUTRALIZATION SYSTEM. DO YOU KNOW WHAT
14 HAPPENED TO THOSE?

15 A. YES. I GUESS -- AND I AM GUESSING. I
16 THINK, PERHAPS, IT COULD HAVE BEEN ONCE A YEAR,
17 ONCE EVERY SIX MONTHS, BUT IT WAS NOT VERY OFTEN,
18 SOME CONTRACTOR WAS CONTACTED, AND THEY HAD A
19 SIPHON, A LONG PIPE THAT THEY BROUGHT IN AND
20 SIPHONED IT INTO A BIG TRUCK. FROM THAT POINT --
21 AND THAT, AGAIN, AT THAT TIME, THAT WAS CHECKED BY
22 THE CITY BECAUSE THAT WAS UNDER SOME FORM OF
23 REGULATION.

24 Q. DO YOU KNOW WHO THE CONTRACTORS WERE?

25 A. NO, I DON'T REMEMBER. IT COULD HAVE BEEN --

CUTLER - WOODS

1 USUALLY FROM PHONE BOOKS, SOMEONE WHO CLEANS OUT
2 SEWERS. BUT IT WAS -- THE NATURE OF THE MATERIAL
3 WAS AS I STATED.

4 Q. NOW, YOU'VE MENTIONED OR YOU'VE TESTIFIED
5 WITH RESPECT TO PLANT PROCESSES THAT SOLVENTS WERE
6 PRESENT IN THE PLANT?

7 A. THAT'S RIGHT.

8 Q. DID SOLVENTS PRODUCE ANY WASTE?

9 A. YES -- WELL, THEY NORMALLY WOULD BE WASTE IN
10 ANY OTHER PLANT BUT OUR PLANT. WE HAD THE FIRST
11 SOLVENT RECOVERY SYSTEM THAT EXISTED IN THE UNITED
12 STATES. IT WAS THE FIRST ONE EVER TO BE BUILT.
13 SO, THE RESULT OF IT WAS WE HAD NO AIR POLLUTION.
14 THE PURPOSE WAS TO ELIMINATE AIR POLLUTION IN THE
15 CITY OF PHILADELPHIA, AND THAT WAS UNDER
16 REGULATION. SO, THE SOLVENTS WERE RECOVERED.

17 Q. ANY RESIDUALS WOULD NOT END UP BEING
18 RECOVERED?

19 A. NOT FROM THE SOLVENT RECOVERY SYSTEM.

20 Q. HOW ABOUT THE OTHER USES OF SOLVENTS?

21 A. IT'S A LITTLE COMPLEX, THERE'S LITTLE
22 PHASES. SOLVENTS WERE RECOVERED 98 PERCENT.
23 ANYTHING ELSE, THE 2 PERCENT WAS LOST IN THE
24 ATMOSPHERE, WHATEVER WAS ALLOWED BY WHATEVER
25 MONITORING THAT OCCURRED. THE SYSTEM WAS PUT IN

1 AS A SHOWPIECE. PEOPLE CAME FROM ALL OVER THE
2 WORLD TO SEE IT.

3 Q. WITH RESPECT TO OTHER PORTIONS OF THE PLANT,
4 WAS THERE A SOLVENT OR A SOLVENT INK BASE SLUDGE
5 THAT WAS WASTE?

6 A. YES, THAT WAS ANOTHER PORTION.

7 Q. WHERE WAS IT PRODUCED FROM?

8 A. IT WAS VERY -- THIS WOULD BE LESS OF MY
9 SPECIFIC KNOWLEDGE, BUT IT WAS PRODUCED WITH SMALL
10 AMOUNTS OF EXCESS INK, SMALL AMOUNTS OF EXCESS INK
11 THAT WERE LEFT IN A DRUM.

12 Q. DO YOU HAVE ANY IDEA HOW MUCH WAS PRODUCED
13 ON A MONTHLY BASIS?

14 A. NO, BUT THEY WERE REUSED. SMALL AMOUNTS OF
15 INK WERE LEFT IN THE DRUM, WERE PUT IN ONE BIG
16 MIXING VAT, AND TOGETHER THEY MADE BLACK INK, AND
17 THEY WERE REUSED WHEN THAT OCCURRED.

18 Q. WOULD IT BE YOUR TESTIMONY THAT THERE WAS,
19 TO YOUR KNOWLEDGE, NO RESIDUAL AFFLUENT FROM THAT
20 PROCESS?

21 A. NO, I COULDN'T STATE THAT BECAUSE I'LL HAVE
22 TO PRESENT IT THIS WAY: IF YOU HAD A CAN OF PAINT
23 AND YOU WERE PAINTING THIS ROOM, AND SOMEONE LEFT
24 THAT CAN OF PAINT OPENED FOR A WEEK, THE SOLVENT
25 WOULD EVAPORATE, BY CHANCE, AND YOU WOULD HAVE A

CUTLER - WOODS

1 HARD -- YOU COULD HAVE AN INCH OF NOT SOLVENT, BUT
2 AN INCH OF PIGMENT AND RESIN DRIED UP ON THE
3 BOTTOM. THAT WOULD BE THE TRUE RESIN THAT I THINK
4 -- I BELIEVE THAT YOU'RE TALKING ABOUT.

5 Q. THAT'S WHAT I AM TALKING ABOUT. I CAN
6 CLARIFY IT A LITTLE FURTHER FOR YOU BECAUSE WE'RE
7 BOTH KIND OF WORKING IN BROWN PAPER BAGS WITH NO
8 LIGHTS ON IN THE INSIDE IN THAT WE HAVE NO IDEA
9 WHAT THE OTHER IS TALKING ABOUT SOMETIMES. IF I
10 CAN, LET ME SAY THAT THERE'S BEEN TESTIMONY SO FAR
11 THAT THERE WAS PRODUCED -- NOT PRODUCED BUT THERE
12 WAS AFFLUENT IN THE NATURE OF A SLUDGE, INK SLUDGE
13 SOLVENT WHICH WAS TAKEN FROM THE PLANT IN THE
14 AMOUNTS OF 20 TO 25 DRUMS ONCE A WEEK OR TWICE A
15 WEEK.

16 DO YOU HAVE ANY KNOWLEDGE WITH RESPECT TO
17 THAT?

18 A. I HAVE NO KNOWLEDGE OF THAT, AND I REALLY
19 DON'T BELIEVE IT. I THINK -- I THINK THERE'S SOME
20 -- I SHOULDN'T -- I HAVE NO KNOWLEDGE OF THAT 20
21 TO 25 DRUMS A WEEK COMING FROM THE PLANT.

22 Q. OR TWO WEEKS, ONCE EVERY TWO WEEKS?

23 A. NO, I HAVE NO KNOWLEDGE OF ANY SUCH THING.

24 Q. WHY WOULD YOU BE INCLINED NOT TO BELIEVE IT?

25 A. WHAT YEAR WAS THIS?

CUTLER - WOODS

1 Q. THIS WOULD BE IN THE YEARS '60 TO '71.

2 A. IT WOULDN'T MAKE SENSE.

3 Q. WHY IS THAT?

4 A. BECAUSE WE HAD A TANK TO PUT IT IN, TO SAVE
5 MONEY. IT ALL BECAME BLACK INK, AND I WOULD BE
6 SURPRISED TO HEAR THAT. I WOULD BE SURPRISED TO
7 KNOW THAT. THAT'S ALL.

8 Q. OKAY. I'M JUST RELATING TO YOU EARLIER
9 TESTIMONY.

10 A. TO HAVE THAT AMOUNT, I WOULD CONSIDER THAT,
11 IF I KNEW ABOUT IT, WAS IN CHARGE OF IT, I WOULD
12 HAVE STOPPED IT, NOT FOR ANY OTHER REASON, OTHER
13 THAN IT WASN'T ECONOMICAL.

14 Q. WAS THERE ANY OTHER PROCESS IN YOUR PLANT
15 THAT WOULD HAVE PRODUCED THAT MUCH WASTE?

16 A. I AM SORRY, WHAT WAS THE AMOUNT YOU'VE
17 MENTIONED?

18 Q. WE'RE TALKING ABOUT 20 TO 25 55-GALLON DRUMS
19 ON A WEEKLY TO BIWEEKLY BASIS -- EXCUSE ME, EVERY
20 TWO WEEKS.

21 A. IT WOULD BE INCONCEIVABLE THAT OCCURRED TO
22 ME. LET ME EXPLAIN THAT. I CAN SEE A QUARTER OF
23 A DRUM. IF YOU'RE ASKING ME IF A 55-GALLON DRUM,
24 NEVER WOULD TRIANGLE PUBLICATIONS OR ANYONE
25 INVOLVED IN TRIANGLE PUBLICATIONS ALLOW 25 DRUMS

CUTLER - WOODS

1 OF MATERIAL, FULL DRUMS TO GO OUT LIKE THAT. IT
2 WOULD BE SENT BACK TO THE INK COMPANY BECAUSE IT'S
3 A POLICY OF THE INK COMPANY WRITTEN IN OUR
4 PURCHASE ORDERS THAT THEY WOULD TAKE ANY EXCESS
5 BACK. I DON'T KNOW WHO TESTIFIED TO THAT.

6 Q. LET ME ASK YOU THIS THEN: THEN THERE WOULD
7 HAVE BEEN NO RESIDUAL SLUDGE MATERIAL --

8 A. YES.

9 Q. YES, THERE WOULD HAVE BEEN?

10 A. YES, AS I'VE MENTIONED, YOU COULD HAVE 25
11 DRUMS OF DRIED INK CANS, WHICH WOULD MEAN,
12 SOMEONE, WHEN THEY EMPTIED A DRUM AND THEY HAVE
13 TILTED IT AND PERHAPS THAT MUCH WAS LEFT AND
14 DRIED, AND THEY HAVE TO GET RID OF THOSE DRUMS
15 (INDICATING). THOSE DRUMS, YOU CAN'T LEAVE THEM
16 AROUND. AND I WOULD SUSPECT WHOEVER MADE THAT
17 TESTIMONY DID NOT KNOW THAT. I AM NOT GOD. I
18 WASN'T THERE.

19 Q. YOUR TESTIMONY MAY BE A LITTLE UNCLEAR RIGHT
20 NOW BECAUSE YOU'RE GESTURING, AND LET ME SEE IF I
21 CAN SUMMARIZE IT AND MAKE IT A LITTLE CLEARER FOR
22 THE RECORD. YOUR TESTIMONY IS IF 20 TO 25 GALLONS
23 WENT OUT, WHICH IS POSSIBLE, THEY WOULD HAVE GONE
24 OUT BECAUSE THEY WERE USED AND THE ONLY MATERIAL
25 THAT WOULD HAVE BEEN IN THEM WOULD HAVE BEEN A

CUTLER - WOODS

1 SMALL AMOUNT OF SLUDGE AT THE VERY BOTTOM OF THE
2 BARREL; IS THAT YOUR TESTIMONY?

3 A. I CAN'T TESTIFY THAT IT OCCURRED, BECAUSE I
4 WASN'T DIRECTLY IN CHARGE OF THAT. BUT I WOULD BE
5 VERY SURPRISED TO HEAR THAT. I WOULD BE VERY
6 SURPRISED.

7 Q. TO YOUR KNOWLEDGE THEN THERE WOULD NOT HAVE
8 BEEN SHIPPED OUT OF THE PRINTING PRESS PROCESS 20
9 TO 25 FULL 55-GALLON DRUMS ON A WEEKLY OR BIWEEKLY
10 OR ONCE EVERY TWO WEEKS?

11 A. NO WAY. IT WOULD HAVE GONE INTO THE INK
12 COMPANY BEYOND ANY QUESTION. IT WOULD BE SENT TO
13 THE INK COMPANY. SOMEBODY WOULD HAVE TO BE
14 TOTALLY DERELICT IN THEIR DUTIES. IT HAS NOTHING
15 TO DO WITH HAZARDOUS WASTES.

16 Q. WAS THERE ANY OTHER PROCESS WHICH WOULD HAVE
17 PRODUCED A WASTE AFFLUENT IN THAT VOLUME FROM THE
18 PLANT?

19 A. A ONE-SHOT CLEAN-OUT OF A SOLVENT RECOVERY
20 SYSTEM, BUT NOT THAT TYPE OF WEEKLY VOLUME.
21 CLEAN-OUT COULD HAVE OCCURRED ONCE A YEAR, ONCE
22 EVERY SIX MONTHS. I DON'T RECALL WHETHER IT WAS
23 ONCE A YEAR OR ONCE EVERY SIX MONTHS. A
24 CLEAN-OUT, WHAT WE CALL THE DECANTING SYSTEM,
25 WHICH IS ANOTHER PHASE OF THIS. ALL THESE ARE

1 INTERRELATED, BUT NOT RELATED. THAT IS THE ONLY
2 PLACE THAT I CAN SEE WHERE A ONE-SHOT SITUATION
3 COULD OCCUR.

4 Q. HOW MUCH WASTE WOULD THAT HAVE PRODUCED?

5 A. I CAN'T -- I DON'T KNOW THAT. I DON'T
6 REALLY HAVE THAT ANSWER, BUT I WOULD SUGGEST THAT
7 THERE COULD BE -- IT COULD BE 20 DRUMS OF THAT
8 GOING OUT EVERY SIX MONTHS OR WHENEVER THE
9 CLEAN-OUT OCCURRED. THAT'S THE ONLY REMOTE
10 POSSIBILITY THAT I CAN THINK OF.

11 Q. WHAT WAS THE NATURE OF THAT WASTE?

12 A. DRIED PIGMENT AND RESIN.

13 Q. DO YOU KNOW ANY OF THE CHEMICAL CONSTITUENTS
14 OF THE WASTE?

15 A. A MYRIAD -- THE INK COMPANY WOULD KNOW THAT
16 AND THEY WERE UNDER -- THEY WERE FULLY
17 KNOWLEDGEABLE OF HAZARDS AT THAT TIME. IT WAS
18 KNOWN IF THERE WAS SOMETHING HAZARDOUS. WE WERE
19 REGULATED BY, I BELIEVE, THE INSURANCE COMPANY,
20 MADE MONTHLY INSPECTIONS. IT WAS -- THERE WERE
21 SAFETY COMMITTEES.

22 Q. WHO WAS THE INSURANCE COMPANY, DO YOU
23 REMEMBER?

24 A. LIBERTY MUTUAL, AT LEAST DURING THE GREATER
25 PORTION OF IT. LIBERTY MUTUAL.

CUTLER - WOODS

1 Q. WHO SAT ON THE SAFETY COMMITTEE?

2 A. AND ALL THE UNION REPRESENTATIVES AND
3 PROBABLY HEADED BY -- I DON'T KNOW WHO THE
4 INDIVIDUAL WOULD BE AT THE MOMENT. I DON'T RECALL
5 THAT.

6 Q. CAN YOU RECALL ANY NAMES OF ANYBODY THAT
7 WOULD HAVE SAT ON THE SAFETY COMMITTEE?

8 A. NO, I DON'T RECALL WHO MIGHT HAVE BEEN HIRED
9 TO DO THAT.

10 Q. IF YOU RECALL ANY NAMES, WOULD YOU ADVISE
11 YOUR LAWYER OF THOSE NAMES, AND IF HE WOULD BE SO
12 KIND TO COMMUNICATE THOSE NAMES TO ME.

13 A. YES.

14 Q. NOW, YOU'VE TESTIFIED THAT SEVERAL TIMES
15 MATERIALS WHICH THE PROCESS PRODUCES IRON-TYPE
16 SLUDGE FROM THE NEUTRALIZATION SYSTEM, SMALL
17 AMOUNTS FROM THE PRESSROOM OF AN INK SLUDGE, AND
18 IN TURN, RESIN AND PAINT-TYPE MATERIAL FROM THE
19 SOLVENT RECOVERY SYSTEM. DID THAT PLANT PRODUCE
20 ANY OTHER LIQUID, CHEMICAL-TYPE WASTES?

21 A. THE PLANT'S PURPOSE WAS TO PRINT THIS INK ON
22 THIS PAPER. SO, THERE WERE NO -- DID THEY PRODUCE
23 ANY CHEMICALS? NO CHEMICALS WERE MANUFACTURED OR
24 PRODUCED AT THIS COMPANY.

25 Q. I AM TALKING ABOUT WASTES, THOUGH, AS A

CUTLER - WOODS

1 BY-PRODUCT OF YOUR MANUFACTURING PROCESS, BESIDES
2 WHAT YOU'VE ALREADY TOLD ME.

3 A. THERE WAS A PLATING DEPARTMENT. THERE WAS A
4 PLATING DEPARTMENT, AND THE PLATING DEPARTMENT
5 WENT INTO THE NEUTRALIZATION TANK. THAT'S ONE OF
6 THE PURPOSES OF ENGRAVING IN THE PLATING
7 DEPARTMENT. THEY HAD NO MORE THAN NORMAL
8 PRODUCTION OF WASTE, BUT THERE COULD BE A SPILL, A
9 TANK COULD OVERFLOW, BUT THE CERAMIC LINES LED TO
10 THE NEUTRALIZATION TANK IN THE EVENT THAT
11 OCCURRED. THAT'S THE SULFURIC ACID THEY HAD. I
12 DON'T RECALL BUT THAT MAY BE 5 PERCENT SULFURIC
13 AND COPPER SULFATE. SO THEY WENT TO THE
14 NEUTRALIZATION TANK.

15 Q. SO, ESSENTIALLY, THAT WOULD ALL BE
16 NEUTRALIZED OUT IN THE TANK, THOUGH?

17 A. YES, THAT WAS THE PURPOSE OF THAT.

18 Q. CAN YOU THINK OF ANY OTHER WASTES, LIQUID,
19 CHEMICAL OR SLUDGE-TYPE WASTE THE PLANT WOULD HAVE
20 PRODUCED OTHER THAN WHAT WE'VE ALREADY SPOKEN
21 ABOUT?

22 A. VERY MINOR THINGS, LIKE WHAT THE MACHINE
23 SHOP MIGHT USE. SOMEONE -- IF YOU'RE TALKING
24 ABOUT MINOR QUANTITIES, A GALLON?

25 Q. NO.

CUTLER - WOODS

- 1 A. I DON'T THINK --
- 2 Q. I AM TALKING ABOUT SOMETHING PRODUCED ON A
- 3 REASONABLE REGULAR BASIS AND MORE THAN MINOR
- 4 AMOUNTS IN TERMS OF FOUR OR FIVE GALLONS.
- 5 A. DRY GLUF, DRY GLUE FROM THE BINDERY
- 6 DEPARTMENTS, THE SAME THING THAT OCCURRED WITH
- 7 INK. THAT WOULD BE A VERY SMALL, TINY QUANTITIES,
- 8 BECAUSE THE GLUES WERE NOT LARGE QUANTITIES.
- 9 SOMEONE COULD HAVE LEFT A DRUM OPENED, AND YOU'D
- 10 GET SOME DRIED GLUE. THAT'S POSSIBLE. I DON'T
- 11 KNOW WHAT THEY WOULD CONTAIN.
- 12 Q. MR. CUTLER, ARE YOU FAMILIAR AT ALL WITH THE
- 13 DISPOSAL PRACTICES, THE ACTUAL DISPOSAL PRACTICES
- 14 OF TRIANGLE?
- 15 A. SOME OF THEM, BUT NOT ALL OF THEM. I'M NOT
- 16 SURE WHICH ONES YOU'RE TALKING ABOUT.
- 17 Q. LET ME GET MORE SPECIFIC THEN. NOW, YOU'VE
- 18 TESTIFIED THAT TRIANGLE PRODUCED A CERTAIN AMOUNT
- 19 OF WASTES FROM PUMPING OF ITS NEUTRALIZATION
- 20 SYSTEM, FROM THE CLEANING OUT OF ITS SOLVENT
- 21 RECOVERY SYSTEM AND POSSIBLY FROM ITS PRESS SHOP
- 22 IN TERMS OF SLUDGE INKS. THE QUESTIONS I HAVE
- 23 WILL REVOLVE AROUND TRANSPORTERS, USE OF
- 24 TRANSPORTERS AND SITES, OFF-SITE DISPOSAL DURING
- 25 THE PERIOD 1960 AND 1971.

CUTLER - WOODS

1 WHY DON'T WE START BEGINNING WITH, DO YOU
2 KNOW WHO TOOK THOSE WASTES FROM YOU, TRANSPORTED
3 THEM?

4 A. I JUST -- I WAS JUST TOLD THAT. I WAS TOLD
5 THAT -- I HAD NO PRELIMINARY MEETINGS. I WAS TOLD
6 THAT TODAY.

7 Q. ASIDE FROM WHAT YOU'VE LEARNED TODAY, DO YOU
8 HAVE ANY KNOWLEDGE WITH RESPECT TO WHO WAS
9 TRANSPORTING THE WASTES DURING THE PERIOD OF 1960
10 THROUGH '71?

11 A. I HAD NO KNOWLEDGE OF THEM TRANSPORTING
12 WASTES PERIOD, LET ALONE, WHO. I HAD NO KNOWLEDGE
13 THAT ANY SUCH THING EXISTED.

14 Q. WHY DIDN'T YOU HAVE ANY KNOWLEDGE?

15 A. THE PURCHASING DEPARTMENT WAS UNDER THE
16 JURISDICTION OF THE CONTROLLER.

17 Q. SO, IT WAS NOT WITHIN YOUR AREA OF
18 SUPERVISION AS PLANT MANAGER?

19 A. YES, THAT'S CORRECT.

20 Q. WAS THERE A MANAGERIAL REASON FOR NOT
21 PUTTING IT UNDER YOUR AUSPICES?

22 MR. KRANCER: IF YOU KNOW.

23 THE WITNESS: I THINK THE FINANCIAL
24 -- I WOULD SUGGEST -- I WAS NOT INVOLVED WITH THE
25 FINANCIAL OR SALES PORTION, SALES DIVISIONS OF THE

CUTLER - WOODS

1 COMPANY; AND SINCE PURCHASING INVOLVED, I GUESS, A
2 GREAT DEAL OF APPROVAL FROM THE CONTROLLER'S
3 OFFICE, THE CONTROLLER CHOSE TO KEEP THAT UNDER
4 HIS JURISDICTION, BUT WITH ADVICE. HE SIGNED ALL
5 -- HE HAD FINAL AUTHORITY IN SIGNING ALL PURCHASE
6 ORDERS.

7 Q. I WANT YOU TO UNDERSTAND THE REASON FOR MY
8 QUESTION. IT SEEMS UNUSUAL THAT A PLANT MANAGER
9 WOULD NOT SUPERVISE THAT ASPECT OF THE OPERATION.
10 I DON'T DOUBT WHAT YOU'RE SAYING. I JUST WANT TO
11 UNDERSTAND WHY THAT WASN'T THE CASE HERE.

12 A. IT WAS A LITTLE DIFFERENT.

13 Q. WERE YOU AWARE THAT OFF-SITE DISPOSAL WAS
14 TAKING PLACE THAT THE PLANT GENERATED?

15 A. MY KNOWLEDGE WAS THAT WE WERE RECYCLING
16 DRUMS.

17 Q. DID YOU HAVE ANY KNOWLEDGE AT THE TIME,
18 BETWEEN 1960 AND THROUGH '71, LEAVING ASIDE WHAT
19 YOUR ATTORNEYS HAVE TOLD YOU TODAY, DO YOU HAVE
20 ANY KNOWLEDGE OF THE OPERATIONS OF MARVIN JONAS?

21 A. JUST WHAT I'VE READ IN THE PAPER.

22 Q. WHAT DID YOU READ IN THE PAPER DURING THAT
23 PERIOD?

24 A. OH, DURING THAT PERIOD. I MEANT IN THE LAST
25 -- NO, DURING THAT PERIOD, I WOULDN'T KNOW. I

CUTLER - WOODS

1 MEANT WHAT I'VE READ IN THE PAPER A COUPLE YEARS
2 AGO, REGARDING JONAS. LIPARI DUMP SITE HAS BEEN
3 IN THE PAPERS OVER AND OVER AGAIN. SO, YOU HAVE
4 TO HAVE SOME KNOWLEDGE OF THAT.

5 Q. LET'S TRY TO CONFINE, JUST FOR THE MOMENT,
6 YOUR TESTIMONY TO THE PERIOD -- CONTEMPORANEOUS
7 PERIOD WHEN YOU WERE WORKING IN TRIANGLE FROM 1960
8 TO '71.

9 DID YOU DEAL WITH JONAS AT ALL?

10 A. NO.

11 Q. DO YOU HAVE ANY KNOWLEDGE OF HIM AT ALL AT
12 THAT TIME?

13 A. I HAD NO BUSINESS KNOWLEDGE WHATSOEVER,
14 EXCEPT HIS AD IN THE PHONE BOOK, WHICH I THINK WAS
15 PRETTY OBVIOUS, HE RECYCLED DRUMS.

16 Q. DID YOU SEE HIM AT THE PLANT AT ALL?

17 A. NO.

18 Q. DID YOU KNOW HE WAS SERVICING THE PLANT?

19 A. I DON'T RECALL WHETHER I KNEW THAT OR NOT.

20 I REALLY DON'T. I AM NOT SURE. IT'S VERY
21 POSSIBLE THAT I WOULD HAVE KNOWN, BUT
22 SPECIFICALLY, WHETHER HE WAS ONE OF FIVE OR SIX OR
23 TEN, I WOULDN'T KNOW.

24 Q. DID YOU KNOW NAMES OF ANY OTHER WASTE
25 HAULERS WHICH WERE SERVICING THE PLANT DURING THAT

1 PERIOD?

2 A. WELL, THAT'S WHAT BOTHERS ME IN THIS WHOLE
3 PICTURE NOW. I HAVE NO KNOWLEDGE OF WASTE WAS
4 GOING OUT ANYWHERE. SO, TO MY KNOWLEDGE THESE
5 WERE DRUMS, AND WHAT WAS GOING IN, DRUMS THAT WERT
6 DIRTY, NOT FILLED WITH MATERIALS, DRUMS THAT ARE
7 DIRTY, THAT THE INK COMPANY EITHER DIDN'T TAKE
8 BACK AND THEY COULD BE CLEANED BY SEVERAL PEOPLE
9 WHO HAD A CLEANING MACHINE, AND THEY CLEANED THEM
10 AND REUSED THEM. THAT WAS MY KNOWLEDGE OF WHAT
11 WAS HAPPENING.

12 Q. ASIDE FROM WHAT YOUR ATTORNEYS TOLD YOU
13 ABOUT THE CASE TODAY AND ASIDE FROM WHAT YOU'VE
14 READ IN THE PAPERS, DID YOU LEARN FROM ANY OTHER
15 SOURCES ABOUT THE ACTIVITIES OF MARVIN JONAS AT
16 THE TRIANGLE PLANT, ANY INFORMATION AT ALL?

17 A. YOU MEAN WHILE I WAS THERE?

18 Q. EITHER WHILE YOU WERE THERE OR SINCE THAT
19 TIME?

20 A. YES, MR. SHEEHAN CALLED ME AND ASKED ME --
21 MR. SHEEHAN CALLED ME AND ASKED ME SOME QUESTIONS
22 ON THE PHONE, AND ASKED ME IF I WAS FAMILIAR WITH
23 SOME OF THE THINGS THAT YOU'RE ASKING. AND I
24 DISCUSSED THAT WITH HIM ON THE PHONE, YES. HE
25 WOULD BE THE ONLY PERSON THAT I HAD ANY

1 THE POSSIBILITIES. THAT'S ALL: THERE'S A
2 SIGNATURE ON THERE.

3 Q. WHOSE SIGNATURE WOULD THAT BE?

4 A. I AM TRYING TO DETERMINE WHOSE SIGNATURE.
5 I'M TRYING TO FIND OUT WHAT THIS MEANS.
6 APPROVAL. I DON'T KNOW WHOSE SIGNATURE THAT IS.
7 THAT -- SOMEONE MIGHT KNOW.

8 Q. I TAKE IT, THEY DON'T RING A BELL?

9 A. WHAT'S THIS (INDICATING)?

10 NO, I'M SURPRISED TO SEE THIS. SOMETHING
11 CHANGED SOMEWHERE. IF IT OCCURRED -- IT DIDN'T
12 OCCUR PRIOR TO THIS?

13 Q. WE DON'T KNOW. IT MAY WELL HAVE. BUT THE
14 DOCUMENTS WE HAVE ARE DURING THIS PARTICULAR
15 PERIOD.

16 THE SECOND QUESTION WAS: DO YOU HAVE ANY
17 IDEA WHAT SLUDGE THAT WOULD BE?

18 A. IF IT'S TRUE, IF IT'S TRUE THAT THERE WAS 55
19 GALLONS OF MATERIAL IN THERE, IF JONAS WAS REALLY
20 NOT TAKING EMPTY DRUMS OUT, NOT TAKING EMPTY DRUMS
21 AND CHARGING TRIANGLE, I MEAN THAT'S MY FIRST
22 INCLINATION. I'M JUST WONDERING -- DID DI NARDO
23 SAY THEY WERE FULL DRUMS?

24 Q. DI NARDO'S TESTIMONY DIDN'T DEAL WITH THAT.

25 A. IF JONAS WASN'T PULLING SOMETHING OVER ON

CUTLER - WOODS

1 THE COMPANY, I DON'T KNOW. IF IT'S TRUE, I'M
2 SURPRISED, BECAUSE MY KNOWLEDGE IS TO GET RID OF
3 EMPTY DRUMS THAT WERE ENCRUSTED INK. THAT WAS
4 ORIGINALLY -- IT WAS TO BE CALLED FOR THAT
5 PURPOSE. NOW, I CAN'T ANSWER. THAT'S AS MUCH AS
6 I WOULD KNOW. I CAN GUESS AT ANY NUMBER OF THINGS
7 HERE. IT SOUNDS TO ME LIKE SOMETHING CHANGED.
8 THIS COULD NOT HAVE OCCURRED OVER A TEN-YEAR
9 PERIOD, I'M GOING TO SAY, WITHOUT MYSELF,
10 SOMEWHERE ALONG THE LINE, HAVING GOT INVOLVED.

11 Q. MR. DI NARDO'S TESTIMONY WAS, HE BELIEVED --
12 IF I REMEMBER CORRECTLY, HE BELIEVED THAT THOSE
13 DRUMS WERE SLUDGE INKS AND SOLVENTS FROM THE
14 PRESSROOM?

15 A. YES, SLUDGE INKS, SLUDGE INKS BECAUSE THE
16 INK COMPANY WOULD BE TAKING THEM BACK. THAT'S MY
17 WHOLE POINT HERE. THE INK COMPANY HAD AN
18 AGREEMENT, I THINK, THEY WOULD TAKE ALL INKS BACK.

19 Q. I HAVE A COUPLE MORE QUESTIONS FOR YOU, MR.
20 CUTLER.

21 A. THE SLUDGES FROM THESE INKS ARE A MIXTURE OF
22 PIGMENTS AND RESINS. I AM NOT AN EXPERT IN
23 HAZARDOUS MATERIALS, BUT TODAY I WOULDN'T CONSIDER
24 THEM HAZARDOUS. THEY MAY BE, BUT I WOULDN'T
25 CONSIDER THEM.

CUTLER - RELATION

1 Q. THAT'S WHY I'M GOING BACK TO IT SO I
2 UNDERSTAND IT.

3 A. THE INK COMPANY WOULD TAKE IT BACK. THAT
4 WAS PART OF OUR CONTRACT. THEY WERE TO TAKE ALL
5 EXCESS INKS AND SOLVENTS, REUSE THEM IN THEIR
6 MANUFACTURE.

7 Q. WAS THE EXCESS TAKEN BACK, EXCESS AFTER THE
8 SOLVENT RECOVERY OPERATION? WAS MORE SOLVENT
9 RECOVERED THAN COULD BE USED SO THAT A CERTAIN
10 AMOUNT OF THAT WAS RETURNED?

11 A. I WOULD SAY THERE WAS USUALLY -- LET ME
12 THINK ABOUT THAT. WOULD YOU REPEAT YOUR
13 QUESTION?

14 Q. IT'S PROBABLY NOT EXACTLY THE SAME, BUT YOU
15 SAID THAT EXCESS SOLVENTS WERE TAKEN BACK BY THE
16 INK COMPANY AND EXCESS INK WAS TAKEN BACK. ARE
17 THEY TWO SEPARATE THINGS? IF SO --

18 A. YES, ONE WOULD GO BACK IN A TANK CAR. THEY
19 WOULD COME IN WITH A TANK CAR. THE SOLVENT
20 WOULDN'T NORMALLY GO IN A DRUM. IT WOULD NOT BE
21 ECONOMICAL TO SHIP IT IN A DRUM. AT THAT TIME,
22 SOLVENTS WERE LIKE 12 CENTS A GALLON. SO, THEY
23 WERE PUMPED FROM THE SOLVENT RECOVERY INTO A
24 TANKER TRUCK THAT THE INK COMPANY WOULD SEND DOWN,
25 THE SOLVENTS. THEY WOULDN'T BE INVOLVED WITH DRUM

1 SHIPMENTS. I MEAN ANYTHING LIKE I'VE SEEN HERE
2 WOULD BE IMPROBABLE.

3 Q. HOW ABOUT INK? DID INK BECOME USED TO A
4 POINT WHERE IT WAS NO LONGER USABLE?

5 A. YES.

6 Q. WAS THAT INK TAKEN BACK?

7 A. YES, THAT INK WAS TAKEN BACK IN DRUMS BY THE
8 INK COMPANY.

9 Q. WAS THIS INK COMPANY INMONT?

10 A. WELL, IT'S INTAG, I-N-T-A-G. THAT WAS THE
11 ORIGINAL COMPANY AS I KNEW IT AND DEALT WITH IT
12 OVER THE YEARS.

13 Q. WOULD THEY HAVE TAKEN INK BACK IN INTAG
14 DRUMS? IF THE INK ORIGINALLY CAME FROM A DRUM
15 FROM INTAG, WOULD THE SAME DRUM BE USED?

16 A. OH, YEAH, THIS IS WHAT THESE DRUMS CAME
17 FROM. ALL OF OUR DRUMS -- ALL 99 PERCENT WOULD
18 COME FROM ANY DRUM WE RECEIVED FROM THEM.

19 Q. DO YOU KNOW WHETHER THE INTAG DRUMS WOULD BE
20 LABELED INTAG?

21 A. YES, YES, THEY ALWAYS HAD LABELS ON THEM.
22 THEY HAD TO BECAUSE THEY WOULD IDENTIFY THE INK
23 BATCH NUMBERS.

24 Q. YOU MAY FINISH YOUR THOUGHT, IF YOU WOULD
25 LIKE.

CUTLER - RELATION

1 WAYS, BUT I WOULD HAVE TO SAY DRUMS. BUT I WOULD
2 HAVE TO TEMPER THAT WITH I BELIEVE, I BELIEVE IT
3 WOULD BE DRUMS.

4 Q. JUST ONE MORE TIME SO I UNDERSTAND IT, WHY
5 WOULD THERE BE EXCESS INK? I CAN UNDERSTAND THAT
6 SOLVENT WAS CHEAP AND MORE WAS PRODUCED THAN
7 NECESSARY FOR USE. WHY WOULD THERE BE EXCESS INK
8 THAT WAS SENT BACK? WHAT WAS THAT FROM?

9 A. FROM THE COMPLETION OF A JOB, A JOB WOULD BE
10 COMPLETE, A T.V. GUIDE WOULD BE PRINTED, AND AT
11 THE POINT OF PRINTING, THERE WAS AN INK FOUNTAIN,
12 AND THOSE FOUNTAINS WERE EMPTIED. THEY MAY
13 CONTAIN TEN GALLONS. I DON'T KNOW WHETHER IT
14 CONTAINED TEN GALLONS. IF IT WAS LEFT IN THE
15 CONTAINER, IT WOULD DRY AND IT WOULD BE A HELL OF
16 A JOB TRYING TO CHIP THAT OUT. SO, THE INK HAD TO
17 BE DRAINED. IT WAS DRAINED IN THIS DRUM, WHICH
18 PRACTICE WAS, NOT TO THROW IT AWAY BECAUSE IT WAS
19 GOOD INK. THE PRACTICE WAS NOT TO THROW IT AWAY
20 OR SHIP IT OUT. I DON'T KNOW WHY THEY WOULD DO
21 IT. BUT IT WOULD BE PUT INTO A DRUM, AND IF
22 THERE'S ANY THOUGHT OF ANY CONTAMINATION, TO SEND
23 IT INTO THIS LARGE TANK, AND THEY WOULD DRAIN OFF,
24 SAY, 90 PERCENT LEVEL, LEAVE 10 PERCENT, AND MAYBE
25 IF SOMEONE FELT THERE WAS A RAG ON THE BOTTOM

1 SOMEWHERE, THEY WOULDN'T WANT TO GET THAT
2 CONTAMINATED. IT WOULD BE A VERY SMALL AMOUNT.

3 DID MR. DI NARDO STATE THAT THESE WERE FULL
4 WASTE DRUMS?

5 Q. MR. DI NARDO --

6 A. STATED THEY WERE FULL WASTE DRUMS OF INK?

7 Q. YOUR ATTORNEY MIGHT WANT TO ANSWER THAT.

8 MR. KRANCFER: I DON'T THINK MR.
9 DI NARDO WENT INTO THAT.

10 THE WITNESS: I'M ALLUDING TO
11 SOMETHING WRONG HERE.

12 MR. WOODS: HE WASN'T CLEAR IN HIS
13 OWN MIND WHETHER THE DRUMS WERE FULL OR
14 OTHERWISE. HE JUST SAID THEY WERE DRUMS WITH INK
15 SLUDGE IN THEM.

16 THE WITNESS: IT WOULD NOT BE GIVEN
17 OUT. SOMEONE WOULD HAVE TO BE VERY DERELICT IN
18 THEIR JOB.

19 BY MS. RELATION:

20 Q. DID YOU SEE ANY DRUMS LABELED AS MARVIN
21 JONAS' DRUMS OR UNLABELED AS -- THAT YOU COULD
22 IDENTIFY THAT WERE NOT TRIANGLE OR INK COMPANY
23 DRUMS AROUND THE SITE?

24 A. I WOULDN'T BE FAMILIAR WITH WHAT WAS ON THE
25 LOADING DOCK ITSELF. IF IT WAS IN THE PLANT, THEN

1 I MIGHT HAVE PASSED BY. BUT I WAS NOT PRIVY TO
2 WATCHING THAT GO IN AND OUT. I WOULD NOT KNOW
3 WHAT WENT IN AND OUT.

4 Q. YOU DON'T REMEMBER REGULARLY SEEING BLACK
5 DRUMS?

6 A. I NEVER SAW THE NAME JONAS.

7 Q. HOW ABOUT UNLABELED BLACK DRUMS THAT WOULD
8 NOT HAVE BEEN LABELED AS CONTAINING ANY KIND OF
9 INK COMING IN, JUST UNLABELED BLACK DRUMS?

10 A. YOU'D HAVE TO BUY DRUMS FOR THAT TO OCCUR.

11 Q. LET ME MOVE ONTO AN EXHIBIT, AND MAYBE
12 YOU'LL UNDERSTAND WHY I'M ASKING THIS QUESTION.

13 A. I AM NOT FAMILIAR OR SURE WHAT YOU'RE
14 GETTING AT OR ASKING.

15 Q. WITHIN GOVERNMENT'S EXHIBIT 30, I SHOWED
16 THIS TO MR. DI NARDO AND YOUR ATTORNEYS AS WELL AT
17 THAT TIME, THERE'S A PURCHASE ORDER DATED FEBRUARY
18 5, 1970, WHICH STATES TO MARVIN JONAS: REMOVAL OF
19 SLUDGE IN DRUMS FROM OUR PLANT FOR YEAR 1970.
20 YOUR FIRM IS TO MAINTAIN A SUPPLY OF SUITABLE
21 EMPTY DRUMS IN OUR PLANT, AND I JUST POINT OUT TO
22 THE WORD "SUITABLE". IT'S VERY HARD TO READ AS
23 EVERYTHING ELSE.

24 A. THE NAMES ARE IN HERE? FORREST LIGHTKAP.
25 THIS IS THE PERSON I AM TALKING ABOUT, THE ONLY

Exhibit B

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SOLID WASTE MANAGEMENT
P.O. BOX 2807 TRENTON, N.J. 08625

REGISTRATION STATEMENT FOR
A SOLID/LIQUID WASTE
COLLECTOR OR HAULER

Section B INSTRUCTIONS - Read Carefully

Type or Print Only

1. Information in Section B is to be completed in Section C. Correct entire line if information given is incorrect. New applicants start application in Section C.
2. Answer all questions in Section C. Incomplete applications will be returned.
3. Complete Vehicle Registration Statement and Taxation Statement.
4. Submit fee payable to "Treasurer, State of New Jersey". Refer to N.J.A.C. 7.25-4 for fee schedule.
5. Send all completed forms and fee to:

Forms may be reproduced
or additional forms
available from:

New Jersey State Department of Environmental Protection
Bureau of Solid Waste Management
P.O. Box 2807 Trenton, New Jersey 08625

COMPLETE AND RETURN THIS FORM AT ONCE - DO NOT PAY UNTIL RECEIVED

Section B Information in this Section was supplied by you last year. Correct in Section C.

1. 09405301
2. INCORPORATED
3.
 - 3A. ** ENTER IN SECTION C
 - 3B. ** ENTER IN SECTION C
 - 3C. ** ENTER IN SECTION C
 - 3D. ** ENTER IN SECTION C
 - 3E. ** ENTER IN SECTION C
 - 3F. ** ENTER IN SECTION C
4. FEID 221849257
- 5.
6. MARVIN JONAS INC
7. BARKRIDGE RD
8. SEWELL NJ 08080
9. 609-468-6129

1. Bureau of Solid Waste Management Number
 2. Type Organization *(See Below)
 3. Corporate or Partnership Data (if any)
 - 3A. Registered in State County
 - 3B. Date of Filing
 - 3C. Agents Name (Last First Init.)
 - 3D. Agents Address
 - 3E. Agents City State Zip Code
 - 3F. Agents Area Code Telephone Number
 4. Applicants Federal Employer ID or Soc. Sec. No.
 5. Applicants Name (Last First Init.)
 6. Company or Trade Name
 7. Street Address
 8. City State Zip Code
 9. Applicants Area Code Telephone No.
- *If corrected it must be one of the following - proprietor, partnership, incorporated, municipality, county, state government, authority, Agent of Federal Government, homeowner or other.

Section C Corrections to Section B or New Applicants. Enter corrections on proper lines.

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1. ~~09405301~~
2. ~~INCORPORATED~~
3. ~~NEW JERSEY~~
 - 3A. ~~New Jersey Gloucester~~
 - 3B. ~~7/3/68~~
 - 3C. ~~Harris Cotton~~
 - 3D. ~~25 N. Broad~~
 - 3E. ~~Woodbury, N.J. 08096~~
4. ☒ FEID or ☐ SS
5. ~~JONAS, Marvin~~
6. ~~BARKRIDGE RD~~
7. ~~SEWELL, NJ 08080~~
8. ~~609-468-6129~~
9. ~~609-468-6129~~

Office
Use
Only

118

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SOLID WASTE MANAGEMENT
P O BOX 2807 TRENTON, N J 08625

OPERATIONAL STATEMENT
A SOLID/LIQUID WASTE
COLLECTION OR HAULER

READ CAREFULLY

PRINT OR TYPE

INSTRUCTIONS:

1. Enter your FEID or SS number from Section B, Line 4 or if new/corrected from Section C, Line 4 of the Registration Statement. (See example on reverse).

2. Check if "FEID" or "SS" is used.

3. Enter waste type for each originating Municipality/City and each disposal site is to have a separate entry. (See example on reverse).

4. Enter quantity in Tons and Liquids in Gallons.

5. Enter City and County, and disposal site.

6. Enter date to reflect your operational activity for the period JANUARY 1, 1974 to DECEMBER 31, 1974

FEID
OR
SS

221049857

Enter your FEID or SS Number Here					
Waste No. or Description	Disposed Amount Tons or Gallons	Originating Municipality or City	Originating County	Disposal Municipality or City	Disposal Site
77	36,168gals.		Penna.	Gloucester	Amadala's
77	36,168gals.		"	Edison	Scientific
77	36,168gals.		"	Ches. W. Lee?	Recycled
77	80,000gals.	Middlesex	Middlesex	Yorhous	Buzby
77	80,000gals.	"	"	Edison	Scientific
77	80,000gals.	"	"	Carlstadt	S.C.P.
77	80,000gals.	"	"	Mantua	Kramer's
77	80,000gals.	"	"	Yorhous	Buzby
77	17,600gals.	Delair	Camden	Yorhous	Buzby
77	6,600gals.	Trenton	Mercer	Yorhous	Kramer's
77	6,600gals.	"	"	Mantua	Buzby
77	6,600gals.	"	Delaware	Yorhous	Buzby
77	5,390gals.	"	Delaware	Mantua	Kramer's
77	5,390gals.	Calstadt	Deegen	New Brunswick	Hecbert's
77	43,333gals.	"	"	Kearny	Municipal
77	43,333gals.	"	"	Trenton	DUNS (Habitat)
77	43,333gals.	"	Delaware	Mantua	Kramer's
77	5,060gals.	"	Delaware		

FOR OFFICE USE ONLY

42-100-14915C
42-100-12105D
42-100-10005D
42-100-04134E
42-100-02055C
42-100-08108A
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NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SOLID WASTE MANAGEMENT
P.O. BOX 2907 TRENTON, N.J. 08625

OPERATIONAL STATEMENT
A SOLID/LIQUID WASTE
COLLECTOR OR HAULER

READ CAREFULLY

PRINT OR TYPE

INSTRUCTIONS:

1. Enter your FEID or SS number from Section B, Line 4 or if new/corrected from Section C, Line 4 of the Registration Statement.
Check if "FEID" or "SS" is used.
2. Enter waste type for each originating Municipality/City and each disposal site is to have a separate entry. (See example on reverse).
3. Wastes are identified in Section D, Line 5 of the Registration Statement. Use the appropriate number to identify the waste.
4. Record Solids in Tons and Liquids in Gallons.
5. Enter originating Municipality/City and County, and disposal site.
6. Entries are to reflect your operational activity for the period JANUARY 1, 1974 to DECEMBER 31, 1974

Enter your FEID or SS Number Here

X FEID
or
SS

221049057

Waste ID Number	Disposed Amount Tons or Gallons	Originating Municipality or City	Originating County	Disposal Municipality or City	Disposal Site	FOR OFFICE USE ONLY
76	4,840gals.	Pennsauken	Camden	Who? Where?	Recycled	04-27-1211B
76	4,040gals.	Pennsauken	Camden	Mantua	Kramer's	04-27-0812A
76	5,200gals.		New York	Middlesex	Marisol	12-00-1211B
76	5,200gals.		New York	Who? Where?	Recycled	12-00-1211B
76	45,900gals.		Pennas.	Vorhees	Buzby's	12-00-0431B
76	45,900gals.		Penna.	Mantua	Kramer's	12-00-0812A
76	45,900gals.		Maryland	Vorhees	Buzby	50-00-0431B
76	10,400gals.		Maryland	Middlesex	Marisol	50-00-1211B
76	10400gals.		Somerset	Pedricktown	Recycled	18-04-1706C
76	232,000gals.	Boundbrook	Somerset	Carlstadt	S.C.P.	18-04-0205D
76	193,000gals.	Boundbrook	Somerset	Edison	Scientific	18-04-1205D
76	193,000gals.	Boundbrook	Somerset	New Brunswick	Herberts	18-04-1204A
76	193,000gals.	Boundbrook	Somerset	Who? Where?	Recycled	18-04-1211B
76	193,000gals.	Boundbrook	Middlesex	Vorhees	Buzby	12-11-0431B
76	32,000gals.	Middlesex	Middlesex	Edison	Scientific	12-11-1205D
76	32,000gals.	Middlesex	Middlesex	Carlstadt	S.C.P.	12-11-0205D

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SOLID WASTE MANAGEMENT
P.O. BOX 2807 TRENTON, N.J. 08625

OPERATIONAL STATEMENT
A SOLID/LIQUID WASTE
COLLECTION OR HAULER

INSTRUCTIONS:

READ CAREFULLY

PRINT ON TYPE

1. Enter your FEID or SS number from Section B, Line 4 or if new/corrected from Section C, Line 4 of the Registration Statement.
Check if "FEID" or "SSI" is used.
2. Each waste type for each originating Municipality/City and each disposal site is to have a separate entry. (See example on reverse).
3. Wastes are identified in Section D, Line 5 of the Registration Statement. Use the appropriate number to identify the waste.
4. Record Solids in Tons and Liquids in Gallons.
5. Enter originating Municipality/City and County, and disposal site.

OFPEntees are to reflect your operational activity for the period JANUARY 1, 1974 to DECEMBER 31, 1974

431638

Enter your FEID or SS Number Here

X FEID
or
SS

221049057

Waste ID Number	Disposed Amount Tons or Gallons	Originating Municipality or City	Originating County	Disposal Municipality or City	Disposal Site	FOR OFFICE USE ONLY
10	03 tons	Middlesex	Middlesex	Edison	Scientific	1.4-1.1-1.205D
10	03 tons	Middlesex	Middlesex	Carlstadt	S.C.P.	1.4-1.1-1.0295A
10	2316 tons		Penna.	Vorhees	Duzyby	1.2-0.0-0.1340
10	2316 tons		Penna.	Edison	Scientific	1.2-0.0-1.205D
10	140 tons		Delaware	Mantua	Kramer's	1.4-0.0-0.810A
10	30 tons		Delaware	Mantua	Kramer's	4.4-0.0-0.810A
10	30 tons		Delaware	Gloucester	Kramer's	1.4-0.0-0.415C
10	22 tons	Bridgeton, NJ	Gloucester	New Brunswick	Herbert's	08-0.9-120.4A
10	22 tons	"	"	Mantua	Kramer's	08-0.9-0.810A
70	33,750	Carlstadt	Bergen	Carlstadt	S.C.P.	02-0.5-0.205A
70	33,750	"	"	Mantua	Kramer's	02-0.5-0.810A
70	33,750	"	"	Kearny	Municipal	02-0.5-0.907F
70	33,750	KP	"	Trenton	DUNS Dust control	02-0.5-1.1999

**OPERATIONAL STATEMENT
A SOLID/LIQUID WASTE
COLLECTOR OR HAULER**

PRINT OR TYPE

1. 100159 Reflect your operational activity for the period JANUARY 1, 1974 to DECEMBER 31, 1974

1) SS 221049052

122

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SOLID WASTE MANAGEMENT
P.O. BOX 2007 TRENTON, N.J. 08625

OPERATIONAL STATEMENT
A SOLID/LIQUID WASTE
COLLECTOR OR HAULER

INSTRUCTIONS:

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PRINT OR TYPE

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3. Wastes are identified in Section D, Line 5 of the Registration Statement. Use the appropriate number to identify the waste.
4. Record Solids in Tons and Liquids in Gallons.
5. Enter originating Municipality/City and County, and disposal site.
6. Entries are to reflect your operational activity for the period JANUARY 1, 1974 to DECEMBER 31, 1974.

Enter your FEID or SS Number Here

IX FEID
OR
SS

221849057

Waste ID Number	Disposed Amount Tons or Gallons	Originating Municipality or City	Originating County	Disposal Municipality or City	Disposal Site	FOR OFFICE USE ONLY
72	37,000 gal	Paulsboro	Gloucester	New Brunswick	Edgeboro	08-14-1204A
72	67,000 gal	Beverly	Burlington	"	"	03-02-1204A
72	49,000 gal	Chester, N.Y.	New York	"	"	49-00-1204A
72	07,000 gal	Carlstadt	Bergen	"	"	02-05-1204A
72	41,000 gal	"	"	"	"	02-05-1204A
72	32,000 gal	E. Rutherford	"	"	"	02-12-1204A
72	23,000 gal	Pennsauken	Camden	"	"	04-27-1204A
72	49,000 gal	Croyden	Pennsylvania	"	"	42-09-1204A
72	10,000 gal	New Holland	Pennsylvania	"	"	42-00-1204A
72	27,000 gal	Philadelphia	"	"	"	42-00-1204A
72	19,050 gal	"	"	"	"	42-00-1204A
72	89,682 gal	Bound Brook	Somerset	Malvern, Pa.	Knickerbocker	18-04-42999
72	25,650 gal	Elizabeth	Union	"	"	20-04-42999
72	427,520 gal	Edison	Sussex	"	"	12-05-42999
72	134,000 gal	Woodbury	Gloucester	"	"	08-22-42999
72	107,000 gal	Woodbury	Gloucester	"	"	08-22-42999

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SOLID WASTE MANAGEMENT
P.O. BOX 2807 TRENTON, N.J. 08625

OPERATIONAL STATEMENT
A SOLID/LIQUID WASTE
COLLECTOR OR HAULER

INSTRUCTIONS:

READ CAREFULLY

PRINT OR TYPE

1. Enter your FEID or SS number from Section B, Line 4 or if new/corrected from Section C, Line 4 of the Registration Statement.
Check if "FEID" or "SS" is used.
2. Each waste type for each originating Municipality/City and each disposal site is to have a separate entry. (See example on reverse).
3. Wastes are identified in Section D, Line 5 of the Registration Statement. Use the appropriate number to identify the waste.
4. Record Solids in Tons and Liquids in Gallons.
5. Enter originating Municipality/City and County, and disposal site.
6. Entries are to reflect your operational activity for the period JANUARY 1, 1974 to DECEMBER 31, 1974

Enter your FEID or SS Number Here

☒ FEID

or

☐ SS

221849057

Waste ID Number	Disposed Amount Tons or Gallons	Originating Municipality or City	Originating County	Disposal Municipality or City	Disposal Site	FOR OFFICE USE ONLY
72	14 ton	Philadelphia	Pennsylvania	Malvern, Pa.	Knickerbocker	
92	7 ton					
72	11 ton					
72	142 ton	Reading				
72	95 ton	Lancaster				
72	41 ton	Phoenixville				
72	11 ton					
72	285 ton	Dover	Delaware			
72	12 ton					
72	21 ton	Sumner				
7116	184 ton	Edison, N.J.	Sussex			12-05-42999
71P	422 ton	Philadelphia	Pennsylvania			28-22-42999
7116	63 ton	Woodbury	Gloucester			08-22-42999
7116	137 ton	Woodbury				17-12-42999
7116	38 ton	Salem	Salem			14-10-42999
7116	20 ton	W. Hanover	Morris			

Exhibit C

NAME

Triangle Publications Inc.

ADDRESS

Gravure Div.

CITY

440 No. Broad Streets

Phila., Pa. 19101

BALANCE FORWARD →

	DATE	FOLIO	DETAIL	DEBIT	CREDIT	BALANCE	PREL. BALANCE
1	1/2/70	R-1	1000		80.00	95.00	180
2	1/8/70	R-1	1010		95.00	20.00	95
3	1/16/70	S-1	1033	145.00		145.00	00
4	1/28	S-3	1052	80.00		245.00	145
5	2-17-70	S-4	1075	100.00		325.00	225
6	2-17-70	S-5	1097	120.00		445.00	325
7	2-26-70	R-3	1335 33		225 -	220 -	445
8	3-7-70	S-7	1121	100 -		320.00	320
9	3-20-70	R-6	1371 59		100 -	220.00	320
10	3-25-70	R-6	1385 03		220 -	- -	220
11	4-4-70	S-11	1160	170.00		170.00	-
12	4-18	S-12	6292	72.00		242.00	170
13	"	S-13	1199	55.00		297.00	242
14	5-1	R-11	1471 30		170.00	127.00	297
15	5-12	R-12	1496 26		127 -	- -	127
16	5-13	S-15	1222	100.00		100.00	-
17	5-29	S-17	1228	85.00		185.00	100
18	6-11	R-14	1563 20		100 -	85.00	185
19	6-23	S-26	1262	100.00		185.00	85
20	6-30	R-14	1593 02		85 -	100 -	185
21	7-11	S-21	1298	155.00		245	100
22	7-31	S-23	1301	60 -		315 -	245
23	8-7	R-18	1614 3		100 -	215 -	315
24	"	"	1677 15		155 -	60 -	315
25	8-15	S-24	1315	100 -		160 -	60

SAFEGUARD BUSINESS SYSTEMS
LANSDALE PA
CHICAGO ILL LOS ANGELES CALIF

ACCOUNTS RECEIVABLE LEDGER

FORM NO. 48-10

NAME
ADDRESS
CITY

Triangle

BALANCE FORWARD →

160 -

	DATE	FOLIO	DETAIL	DEBIT	CREDIT	BALANCE	PREV. BALANCE
1	8-21	R-19	1301	H	60 00	100 -	160 -
2	9-11	R-20	1315	I	100	—	100 -
3	9-11	S-27	1348	95		95 -	—
4	9-29	S-30	1384	105		200	95 -
5	10-2	R-22	1348		95	105 -	200 -
6	10-8	S-31	1396	80		185	105 -
7	10-30	S-33	1424	80		265 -	185 -
8	11-11	S-35	1434	165 00		430 -	265 -
9	11-13	R-26	1384	5	105 00	325 -	430 -
10	"	"	1396	K	80 00	245 -	325 -
11	11-30	S-37	1458	125 -		370 -	245 -
12	12-11	R-28	1424	M	80 -	290 -	370 -
13	12-23	S-40	1476	145 -		435 -	290 -
14	12-24	R-29	1434		165 -	270 -	435 -
15	12-31	R-30	1458		125 -	145 -	270 -
16	12-31	S-41	1486	80 -		225 -	145 -
17	1-19	S-42	1501	155 -		380 -	225 -
18	1-26	S-43	1511	95 -		475 -	380 -
19	2-5	R-33	1476		145 -	330 -	475 -
20	"	"	1486		80 -	250 -	330 -
21	2-9	S-44	1525	95 -		345 -	250 -
22	2-23	S-46	6604	50 -		395 -	345 -
23	2-26	R-34	1501, 1511		250 -	145 -	395 -
24	3-9	S-48	1558	227 -		372 -	145 -
25	3-12	R-35	1525	5	95 -	277 -	372 -

SAFEGUARD BUSINESS SYSTEMS
CHICAGO, ILL. LOS ANGELES, CALIF.

ACCOUNTS RECEIVABLE LEDGER

FORM NO. 10-1-58

NAME
ADDRESS
CITY

Triangle Pub.
431 W. 15th St
Phila Pa 19105

#3

BALANCE FORWARD → 277 -

	DATE	FOLIO	DETAIL		DEBIT	CREDIT	BALANCE	PREV. BALANCE
1	3-23	S-49	1577	✓	100 -		377 -	277
2	2-30	S-50	1590	2	156 -		533 -	377
3	4-20	S-52	1607	W	143 -		676	533
4	4-23	R-38	1558	T		227 -	449 -	676
5	4-30	R-39	1577	U		150 -	349 -	449
6	5-11	S-53	1632	X	91 -		440 -	349
7	5-28	R-41	6604	✓		50 -	390 -	440
8	6-8	S-55	1659	Y	188 50		578 50	390
9	6-11	R-42	1607	W		143 -	435 50	578
10	6-25	R-43	1632	X		91 -	344 50	435
11	6-30	S-57	1684	I	136 50		481 -	344
12	7-9	R-44	1659	Y		188 50	292 50	481
13	7-19	S-59	1703	2	149 50		442 -	292
14	7-19	R-45	1590	2		156 -	286 -	442
15	7-30	R-46	1684	I		136 50	149 50	286
16	8-10	S-61	1722	2	227 50		377 -	149
17	8-30	R-47	1703	2		149 50	227 50	377
18	9-3	R-48	1722	2		227 50	-	227
19	8-24	S-63	1746	2	143 -		143 -	-
20	9-21	S-65	1765	2	104 -		247 -	143
21	10-8	R-51	1746	2		143 -	104 -	247
22	10-12	S-67	1791	2	240 50		344 50	104
23	10-22	R-52	1765	3		104 -	240 50	344
24	10-26	S-69	1810	5	78 -		318 50	240
25	11-5	R-54	1791	4		240 50	78 -	318

SAFEGUARD BUSINESS SYSTEMS
LANSDALE PA
CHICAGO ILL LOS ANGELES CALIF

ACCOUNTS RECEIVABLE LEDGER

FORM NO. 881-178

NAME
ADDRESS
CITY

7
43.7.15th ST Phila 19.30

BALANCE FORWARD →

78 -

	DATE	FOLIO	DETAIL	DEBIT	CREDIT	BALANCE	PRI. C. BALANCE
1	11-9	S-70	1830	139 50		217 50	78
2	11-16	S-71	1843	123 50		341 -	217
3	11-19	R-55	1810		78 -	263 -	341
4	11-30	S-72	1861	273 -		536 -	263
5	12-17	S-74	1881	104 -		640 -	536
6	"	"	6881	36 -		676 -	640
7	12-30	S-74	1894	143 -		819 -	676
8	1-14	R-59	1830, 6881		175 50	643 50	819
9	1-10	S-75	1916	143		786 50	643
10	1-28	R-60	1881, 1843, 1861		500 50	286 -	786
11	1-26	S-77	1942	253 50		539 50	286
12	2-7	S-78	1957	201 50		741 -	539
13	3-1	S-81	2000	89 25		830 25	741
14	3-17	R-65	1894		143 -	687 25	830
15	3-24	R-65	1916		143 -	544 25	687
16	3-21	S-82	2023	195 -		739 25	544
17	4-7	R-67	1942		253 50	485 75	739
18	4-5	S-84	2045	175 50		661 25	485
19	4-21	R-68	1957, 2000, 2023		485 75	175 50	661
20	4-18	S-86	2073	110 50		286 -	175
21	5-3	S-88	2108	227 50		513 50	286
22	5-26	R-72	2045		175 50	338 -	513
23	5-22	S-90	2150	175 50		513 50	338
24	5-23	S-90	2150	175 50		513 50	338
25	6-9	R-73	2073		110 50	403 -	513

SAFEGUARD BUSINESS SYSTEMS
LANSDALE PA
CHICAGO ILL LOS ANGELES CALIF

ACCOUNTS RECEIVABLE LEDGER

FORM NO. AR-18

NAME
ADDRESS
CITY

Triangle Publications
431 71st St
Phila Pa 19130

BALANCE FORWARD → 403 -

	FOLIO	DETAIL	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
1	6-7	A-91 2163	143 -		546	403 -
2	6-16	R-74 2108		227 50	318 50	546 -
3	6-21	A-93 2189	305 50		624 -	318 50
4	6-26	A-93 2203	25 -		649 -	624 -
5	7-14	R-76 2150		175 50	473 50	649 -
6	7-11	A-95 2224	221 -		694 50	473 50
7	7-28	R-77 2203		25 -	669 50	694 50
8	7-25	A-97 2254	150 -		819 50	669 50
9	8-11	R-78 2163, 2224		364 -	455 50	819 50
10	8-15	R-79 2189		305 50	150 -	455 50
11	8-15	A-101 2301	208 -		358 -	150 -
12	8-15	A-101 7054	24 -		382 -	358 -
13	8-29	R-80 2254		150 -	232 -	382 -
14	8-30	A-103 2329	214 50		446 50	232 -
15	9-8	R-83 2301		208 -	238 50	446 50
16	9-8	R-83 7054		24 -	214 50	238 50
17	9-12	A-105 2371	253 50		468 -	214 50
18	9-22	R-82 2329		214 50	253 50	468 -
19	9-29	R-84 2371		253 50	-	253 50
20	9-27	A-107 2408	130 -		130 -	-
21	9-28	A-107 7089	72 -		202 -	130 -
22	10-2	A-108 7095	72 -		274 -	202 -
23	10-3	A-108 2432	234 -		508 -	274 -
24	10-10	A-109 2447	201 50		709 50	508 -
25	10-20	R-87 7089, 2408		202 -	507 50	709 50

SAFEGUARD BUSINESS SYSTEMS
LANSDALE PA
CHICAGO ILL LOS ANGELES CALIF

ACCOUNTS RECEIVABLE LEDGER

FORM NO. 100-178

NAME

CITY

John P. ...
W 31 N. 15th St
Phila. 19130

BALANCE FORWARD

507.50

	DATE	COLIC	DETAIL	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
1	10-25	S-111	2488	221 -		228.50	507.50
2	11-3	R89	2432.7095		306 -	422.50	728.50
3	11-3	R89	2447		201.50	221 -	422.50
4	11-7	S-112	2518	240.50		461.50	221.50
5	11-17	R-91	2488		221 -	240.50	461.50
6	11-29	S-115	2560	325 -		565.50	240.50
7	12-1	R93	2518		240.50	325 -	565.50
8	12-12	S-116	2608	370.50		695.50	325.50
9	12-22	R-96	2560		325 -	370.50	695.50
10	1-3	S-119	7175	46 -		410.50	370.50
11	1-3	S-119	2656	260 -		670.50	410.50
12	1-12	R99	2608		370.50	300 -	670.50
13	1-15	S-121	2695	468 -		768 -	300 -
14	1-25	S-122A	7198	70 -		838 -	768 -
15	1-26	S-122A	7199	24 -		862 -	838 -
16	2-1	R102	7175, 2656		300 -	562 -	862 -
17	1-31	S-123	2742	429 -		991 -	562 -
18	2-15	S-126	2810	338 -		1329 -	991 -
19	2-15	S-126	7218	48 -		1377 -	1329 -
20	2-26	S-127A	2857	305.50		1682.50	1377 -
21	3-9	R107	7218, 7198, 99		142 -	1540.50	1682.50
22	3-9	S-129	2891	227.50		1768 -	1540.50
23	3-15	S-130	2917	136.50		1904.50	1768 -
24	3-21	S-131	2947	247 -		2151.50	1904.50
25	3-30	R110	2891, 2742, 2110, 2857, 2695		1768 -	383.50	2151.50

SAFEGUARD BUSINESS SYSTEMS
 LANSDALE, PA.
 CHICAGO, ILL. LOS ANGELES, CALIF.

ACCOUNTS RECEIVABLE LEDGER

FORM NO. ARL-78

NAME

ADDRESS

CITY

TRIANGLE PUBLICATIONS

431 N. 15th St.

Phila. Pa. 19130

BALANCE FORWARD →

323 50

	DATE	FOLIO	DETAIL	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
1	3-30	A-132	2976	205 50		589 -	383 50
2	4-13	A112	2917		136 50	452 50	589 -
3	4-14	A114	3026	301 50		151 -	452 50
4	4-26	A125	3022	305 50		459 50	654 -
5	5-4	A115	2947		247 -	712 50	459 50
6	5-11	A115	2976		305 50	507 -	712 50
7	5-11	A139	3127	214 50		721 50	507 -
8	5-25	A117	3026		201 50	520 -	721 50
9	5-22	A139	2185	252 50		772 50	520 -
10	6-1	A117	3026		305 50	467 -	772 50
11	6-5	A141A	7282	25 -		442 -	467 -
12	6-5	A141A	7282	25 -		462 -	442 -
13	6-5	A141A	3229	242 50		854 50	462 -
14	6-12	A142	3261	240 50		1095 50	854 50
15	6-22	A121	3127		214 50	850 50	1095 50
16	6-18	A143A	7297	25 -		905 50	850 50
17	6-19	A143A	3296	156 -		1061 50	905 50
18	7-2	A145	3352	347 50		1408 50	1061 50
19	7-16	A125	3180		252 50	1153 50	1408 50
20	7-18	A-5	3463	351 50		1435 -	1153 50
21	7-27	A4	7285, 59, 3239		337 50	1097 50	1435 -
22	8-3	A5	2261		246 50	850 -	1097 50
23	8-5	A5	749 3296		126 -	701 -	850 -
24	8-2	A8	3472	351 -		1052 -	701 -
25	8-10	A6	7297		25 -	1057 -	1052 -

SAFEGUARD BUSINESS SYSTEMS

MINNEAPOLIS PA. LOS ANGELES CHICAGO ATLANTA

ACCOUNTS RECEIVABLE LEDGER

FORM NO. 100-1

10-10

NAME
ADDRESS
CITY

2000 1st St
San Francisco, CA 94107

BALANCE FORWARD →

DATE	FOLIO	DETAIL	DEBIT	CREDIT	BALANCE	PREV. BALANCE
1 2-14	11	2559	169	-	1196	1027
2 3-24	18	3552	-	344	551	1196
3 8-31	21	3552	52	-	1125	851
4 9-12	21	3650	251	-	1374	1183
5 9-20	13	7352	42	-	1426	1384
6 9-28	20	3714	364	-	1790	1426
7 10-5	115	2403	-	351	1459	1790
8 10-4	22	3750	162	50	1621	1459
9 10-4	22	7364	60	-	1681	1621
10 10-12	116	3472 3552	-	351	830	1681
11 10-12	116	3650, 7350	-	243	586	830
12 10-12	124	3792	169	-	755	586
13 10-29	27	4715	513	50	1269	755
14 10-31	28	4623	169	-	1438	1269
15 11-12	29	4638	123	50	1561	1438
16 11-16	24	7364, 3714, 3750, 3792	-	755	806	1561
17 11-19	31	4608	334	-	1040	806
18 11-26	28	4715	-	513	526	1040
19 12-3	1d-2	7406	65	-	591	526
20 12-3	34	4538	331	50	923	591
21 12-7	32	4693	-	169	754	923
22 12-10	35	4501	208	-	962	754
23 12/26	37	4638	-	133	838	962
24 12/28	38	4608	-	234	604	838
25 12/74	12	4424	630	50	1235	604

SAFEGUARD BUSINESS SYSTEMS
LANDALE, CA 94042

ACCOUNTS RECEIVABLE LEDGER

ADDRESS
CITY
431 77. 15TH ST

P.O. Blanket
T-62564
Plain Pa. 19130

BALANCE FORWARD → 1235

	74	FOLIO	DETAIL	DEBIT	CREDIT	BALANCE	TOTAL
1	1/11/74	R4	7406		65 -	1170 -	1235
2	1/11/74	R2	4538		331 50	838 50	1170
3	1/15	R3	4501		265 -	630 50	838
4	1/21	S4	4342	331 50		962 -	630
5	1/31	R5	4434		630 50	331 50	962
6	1/28	S7	4221	286 -		617 50	331
7	2/12	S9	3974	383 50		1001 -	617
8	2/22	S10	3942	273 -		1274 -	1001
9	3/6	S13	3871	266 50		1540 50	1274
10	3/19	S15	3805	253 50		1794 -	1540
11	4/2	S17	4055	318 50		2112 50	1794
12	4/15	R16	4271 50 71 3974 42 4055		1794 -	318 50	2112
13	4/15	S18	4091	201 50		520 -	318
14	4/23	S21	4158	221 -		741 -	520
15	5/20	R21	4055 4091		520 -	221 -	741
16	5/15	S24	5024	390 -		611 -	221
17	5/29	S26	5088	340 -		1001 -	611
18	6/7	R23	4158		221 -	780 -	1001
19	6/13	S28	5149	253 50		1033 50	780
20	6/21	S29	5181	299 -		1332 50	1033
21	7/2	R28	5024 5088		780 -	552 50	1332
22	7/18	R30	5149 5181		552 50	-	552
23	7/17	S34	5291	344 50		344 50	-
24	8/9	S37	5393	292 50		637 -	344
25	8-27	S40	5489	370 50		1007 50	637

NAME

Triangle Publications

ADDRESS

431 W 15th St

CITY

Phila Pa 19130

P.O. Blanket #

T-62564

BALANCE FORWARD →

1007.50

	DATE	FOLIO	DETAIL		DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
1	9/12	A42	5553	25	305.50		1313.00	1007.50
2	9-16	R37	5291	22		344.50	968.50	1313.00
3	9-16	R37	5393	23		292.50	676.00	968.50
4	9/30	A45	55621	26	390.00		1066.00	676.00
5	10/2	R39	5489	24		370.50	695.50	1066.00
6	10/11	R40	5553	25		305.50	390.00	695.50
7	10/18	A34	5691	27	195.00		585.00	390.00
8	10/25	R42	5621	26		390.00	195.00	585.00
9	10/25	A54	5754	28	279.50		474.50	195.00
10	11/8	R44	5691	27		195.00	279.50	474.50
11	11-1	A64	5810	28	640.00		919.50	279.50
12	11-22	R46	5754	28		279.50	640.00	919.50
13	12-6	R48	5810	29		640.00	-	640.00
14	1/7/75	A2	5938	30	426.00		426.00	-
15	1/2/75	A3	5971	30	617.50		1043.50	426.00
16	1-31	A6	6053	31	312.00		1355.50	1043.50
17	2/7	R5	5471 5438	30		1043.50	312.00	1355.50
18	2/17	A9	6133	31	195.00		507.00	312.00
19	2/28	S10	6162	31	346.50		853.50	507.00
20	3/3	R8	6053	31		312.00	541.50	853.50
21	3-21	R10	6133	31		195.00	346.50	541.50
22	3/18	A14	6247	32	273.00		619.50	346.50
23	3/31	R12	6162	31		346.50	273.00	619.50
24	4/14	R14	6247	33		273.00	-	273.00
25	4/7	A19	6319	34	286.00		286.00	-



SAFEGUARD BUSINESS SYSTEMS

SAN DIEGO PA LOS ANGELES CHICAGO ATLANTA

ACCOUNTS RECEIVABLE LEDGER

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30

NAME
ADDRESS
CITY

Triangle Publications

Blanket 1975
T-62564

431 71 15th St
Phila Pa. 19130

BALANCE FORWARD →

286 -

DATE	FOLO	DETAIL	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
4/30	1916	6319		236	-	286 -
4/23	1919	6390	260		260 -	-
5-2	1220	6423	240	50	500 50	260 -
5-22	1222	6474	314	50	845 -	500 50
6/6	R21	6390-6428		500 50	344 50	845 00
6-12	1225	6562	266	50	611 -	344 50
6-20	R23	6474		344 50	266 50	611 -
7-3	1229	6651	318	50	585 -	266 50
7/22	R26	6562		266 50	318 50	585 -
7/31	1232	6744	403	00	721 50	318 50
8/12	R28	6651		318 50	403 00	721 50
8/22	1229	6744		403 00	-	403 00
8/30	1236	6868	344	50	344 50	-
9/19	R33	6868		344 50	-	344 50
9/20	1238	6931	331	50	331 50	-
9/30	1239	6972	253	50	585 00	331 50
10/12	1241	7040	325	00	910 00	585 00
10/23	R36	6931		331 50	578 50	910 00
10/31	R37	6972		253 50	325 00	578 50
-	1242	7102	253	50	578 50	325 00
11/10	R38	7040		325 00	253 50	578 50
11/15	545	7159	253	50	507 00	253 50
11/24	847	7204	292	50	799 50	507 00
12/5	R40	7102		253 50	546 00	799 50
12/19	R42	7159		253 50	292 50	546 00

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 3

NAME
ADDRESS
CITY

Triangle Publications
431 7th St
Philadelphia Pa 19130

WASTE

1976		BALANCE FORWARD →				292.50			
DATE	FOLIO	DETAIL	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE			
1-7-76	R44	7204		292.50	-	292.50			
1-13	A44A	7269	195		195				
1-15	A50	7313	440		635	195			
2-3	A53	7366	328		963	635			
2-6	A46	7269		195	768	963			
2-27	R44	7313		440	328	768			
3-1	A59	7495	312		640	328			
3-3	A52	7366		328	312	640			
3-15	A61	7561	384		696	312			
4-2	R54	7495		312	384	696			
4/13	S65	7687	336.00		720.00	384.00			
4/15	R55	7561		384.00	336.00	720.00			
4/19	S-65	7717	184.00		520.00	336.00			
5/10	S-70	7823	552.50		1072.50	520.00			
5/14	R58	777-7687		520.00	552.50	1072.50			
6/7	S74	7960	314.50		867.00	552.50			
6/11	R62	7823		552.50	314.50	867.00			
6/21	S76	8025	365.50		680.00	314.50			
7/2	R65	7960		314.50	365.50	680.00			
7/16	R67	8025		365.50	-0-	365.50			
7/19	S-80	8140	399.50		399.50	-0-			
8/6	R69	8140		399.50	-0-	399.50			
8/9	S-83	8243	493.00		493.00	-0-			
8/23	S85	8304	323.00		816.00	493.00			
8/27	R70	8243		493.00	323.00	816.00			

NAME
ADDRESS
CITY

W. J. ...
431 N. 15th St
Phila, Pa 19130

WASTE

DATE PAID BY BANK →

323.00

	DATE	DEBIT	CREDIT	BALANCE	
1	9/10 R72	8304	323.00	- 0 -	323.00
2	9/13 S89	8401	323.00	323.00	- 0 -
3	9/30 R75	8401	323.00	- 0 -	323.00
4	10/11 S93	8530	408.00	408.00	- 0 -
5	10/25 S96	8595	442.00	850.00	408.00
6	10/29 R78	8530	408.00	442.00	850.00
7	11/19 R81	8595	442.00	- 0 -	442.00
8	11/25 R87	8125			
9	11/15 S100	8695	416.00	416.00	- 0 -
10	11/30 S101	8739	263.50	679.50	416.00
11	12/10 R85	8695	416.00	263.50	679.50
12	12/20 S102	8757	366.00	629.50	263.50
13	12/30 R84	8739	263.50	366.00	629.50
14	1/10/77		1977		
15	1/10/77 S3	104	484.50	850.50	366.00
16	1/14/77 R1	8757	366.00	484.50	850.50
17	2/4/77 CR3	104	484.50	- 0 -	484.50
18	2/1/77 S7	190	610.00	610.00	- 0 -
19	2/24/77 S11	287	442.00	1052.00	610.00
20	2/24/77 R6	8153			
21	3/11 R7	190	610.00	442.00	1052.00
22	3/25/77 R9	287	442.00	- 0 -	442.00
23	3/21/77 S16	425	408.00	408.00	- 0 -
24	3/31 S18	493	365.50	773.50	408.00
25	4/12/77 R11	425	408.00	365.50	773.50

SAFEGUARD BUSINESS SYSTEMS

ACCOUNTS RECEIVABLE LEDGER

NAME *Triangle*
ADDRESS
CITY

MASTE

BALANCE FORWARD → 365 50

DATE	COL O	DETAIL	DEBIT	CREDIT	BALANCE	CEL BAL
4/29	R13	493		365 50	- 0 -	36
5/9	S24	665	603 50		603 50	- 0
6/3	R16	665		603 50	- 0 -	60
5/31	S27	752	416 50		416 50	- 0
6/20	S31	864	501 50		918 00	41
6/27	S33	889	170 00		1088 00	91
6/30	R20	752		416 50	671 50	108
7/11	S36	969	340 00		1011 50	67
7/15	R22	864		501 50	510 00	101
7/22	R23	889		170 00	340 00	52
7/28	S38	1042	289 00		629 00	34
8/25	R25	969		340 00	289 00	62
8/15	S42	1135	280 50		569 50	28
8/19	R27	1042		289 00	280 50	56
8/22	S43	1168	272 00		552 50	28
9/16	R31	1135		280 50	272 00	55
9/16	R31	1168		272 00	- -	27
9/19	S48	1310	391 00		391 00	- 1
9/31	S57	1377	552 50		943 50	39
10/14	R34	1310		391 00	552 50	94
10/21	R34	1377		552 50	- 0 -	55
10/31	S56	1533	544 00		544 00	- 0
11/7	S58	1577	340 00		884 00	54
11/22	S60	1626	357 00		1241 00	88
11/25	R39	1533		544 00	697 00	124

NAME

CITY

WASTE

BALANCE FORWARD →

697.00

DATE	COL O	DETAIL	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
12/2	R40			340.00	357.00	692.00
12/12	R41	1626		352.00	- 0 -	352.00
12/12	S64	1726	510.00		510.00	- 0 -
12/27	S66	1793	408.00		918.00	510.00
			1978.00			
1/13	R1	1726		570.00	408.00	918.00
1/16	S3	1872	350.00		758.00	408.00
2/1	S6	8303	80.00		838.00	758.00
2/10	R6	1793		408.00	430.00	838.00
2/6	S6	8303	80.00	80.00	350.00	430.00
2/17	R6	1872		350.00	- 0 -	350.00
3/1	S11	2074	560.00		560.00	- 0 -
3/23	R3	2074		560.00	- 0 -	560.00
4/1	S16	2221	610.00		610.00	- 0 -
4/21	R15	2221		610.00	- 0 -	610.00
4/24	S-19	2314	580.00		580.00	- 0 -
5/15	S-23	2417	430.00		1010.00	580.00
5/18	R18	2314		530.00	430.00	1010.00
5/31	S-25	2498	720.00		1150.00	430.00
6/26	S-30	2620	520.00		1670.00	1150.00
6/30	R24	2417		430.00	1240.00	1670.00
7/14	R25	2498		720.00	520.00	1240.00
7/28	R28	2620		520.00	- 0 -	520.00
7/31	S-35	2764	550.00		550.00	- 0 -
8/11	R30	2764		550.00	- 0 -	550.00



RAYMOND BUSINESS SYSTEMS, INC.

RAYMOND BUSINESS SYSTEMS, INC.

ACCOUNTS RECEIVABLE LEDGER

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30

NAME
ADDRESS
CITY

Triangle

WASTE

~~1999~~ 1980 FORWARD →

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	DATE	FOLIO	DETAIL	J	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
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SAFEGUARD BUSINESS SYSTEMS
JANSDALE PA. LOS ANGELES CHICAGO ATLANTA

ACCOUNTS RECEIVABLE LEDGER

FORM NO. AR-1

ACCOUNT	CODE	DEPT	LOC	NO	GROSS AMOUNT	DISCOUNT	NET AMOUNT	INVOICE DATE	REFERENCE
480	723	00			136.50			3/15/73	NY 2917
					136.50	.00	136.50		
<div> <div>DIVISION CODE</div> <div> <div>1 - SPORTS RACING FORM</div> <div>2 - RADIO AND TELEVISION</div> </div> </div> <div> <div>3 - SEVENTEEN (MILS PUBLICATIONS)</div> <div>4 - MCMURRAY PRINTERS</div> </div> <div> <div>5 - TV GUIDE (TELEVISION PUBLICATIONS)</div> <div>6 - GRAVURE</div> </div>									

TRIANGLE PUBLICATIONS, INC. P.O. BOX 789 RADNOR, PA. 19088		NO. 126245 5																														
11 1 PAY TO THE ORDER OF JONAS WASTE REMOVAL BARKRIDGE RD. SEWELL N.J. 08080	DATE 3/15/73	NET AMOUNT \$136.50																														
PROVIDENT NATIONAL BANK PHILADELPHIA, PA.	<table border="1"> <tr> <th>DISTRIBUTION</th> <th>NAME</th> <th>PER</th> <th>DOC</th> <th>DATE</th> </tr> <tr> <td>CORRECTION</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>AUDITED</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>SERVICE TYPES</td> <td></td> <td>POSTED</td> <td></td> <td></td> </tr> <tr> <td>TEMPORARY CHECK REGISTER</td> <td></td> <td>HARDEE</td> <td></td> <td>MAJ.</td> </tr> <tr> <td>REGULAR CHECK REGISTER</td> <td></td> <td>AUDITED</td> <td></td> <td>D</td> </tr> </table>		DISTRIBUTION	NAME	PER	DOC	DATE	CORRECTION					AUDITED					SERVICE TYPES		POSTED			TEMPORARY CHECK REGISTER		HARDEE		MAJ.	REGULAR CHECK REGISTER		AUDITED		D
DISTRIBUTION	NAME	PER	DOC	DATE																												
CORRECTION																																
AUDITED																																
SERVICE TYPES		POSTED																														
TEMPORARY CHECK REGISTER		HARDEE		MAJ.																												
REGULAR CHECK REGISTER		AUDITED		D																												

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
 BARKRIDGE RD. - SEWELL N.J. 08080
 PHILA. (215) SA 7-1118 - N. J. 1-609-488-6128
 MAR 22 1973

INVOICE NO. **NO 2917**
 INVOICE DATE **3/15/73**
 SHIPPED TO

ACCOUNTING DEPT.
 Triangle Publications
 431 N. 15th St.
 Phila. Pa. 19130

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPS NO. & CCL
...	2120				
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
21.	drums of waste removed	6.50	136.50		

GRAVURE DIVISION
 P.O. 739729-N
 Date of Billing 3/15
 Date of Invoice & Postage
 No. of Acct No. 8
 1460-723 136.50
 Approved [Signature]

Jonas Waste Removal
DIVISION OF MARVIN JONAS, INC.
BARKRIDGE RD. - SEWELL, N. J. 08080
PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

INVOICE NO. N^o 2947

SOLD TO
Triangle Publications
431 N. 15th St.
Phila. Pa. 19130

INVOICE DATE 3/21/73

SHIPPED TO

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPH. OR C.O.L.
---------------	----------------	----------	-------	-------------	----------------

QUANTITY	DESCRIPTION	PRICE	AMOUNT
38	drums of waste <i>BRAYNE DIVISION</i> <i>P.O. # 37028-N</i> <i>460-723</i> <i>247.</i> <i>APPROVED</i>	6.50	247.00

RECEIVED
MAR 28 1973
ACCOUNTING DEPT.
ACCOUNTS PAYABLE

27340

TRIANGLE PUBLICATIONS, INC.

127340

ACCOUNT	CODE	DEPT	LOC.	PR.	GROSS AMOUNT	DISCOUNT	NET AMOUNT	INVOICE DATE	REFERENCE
680	723	00			247.00			3/21/73	INV. 2947
					247.00	.00	247.00		

DIVISION CODE

1 - DAILY RACING FORM
2 - RADIO AND TELEVISION

3 - SEVENTEEN TITLE PUBLICATIONS
4 - BUREAU PRINTERS

5 - TV GUIDE (TELEVISION PUBLICATIONS)
11 - GRAYSON

TRIANGLE PUBLICATIONS, INC.

P.O. BOX 730
RADNOR, PA. 19086

NO. 127340

11 2

JONAS WASTE REMOVAL
BARKRIDGE RD.
SEWELL N.J. 08080

PAY TO THE ORDER OF

DATE
50173

	NAME	PER.	DOB	DATE
DISTRIBUTION				
CORRECTION				
AUDITED				
ADVICE				
TERMINARY				
RECEIVED				

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
 BARKRIDGE RD. - SEWELL, N. J. 08080
 PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

APR 18 1973

ACCOUNTING DEPT.
 INVOICE NO. N^o 3026

SOLD TO

Triangle Publications
 431 N. 15th St.
 Phila. Pa. 19130

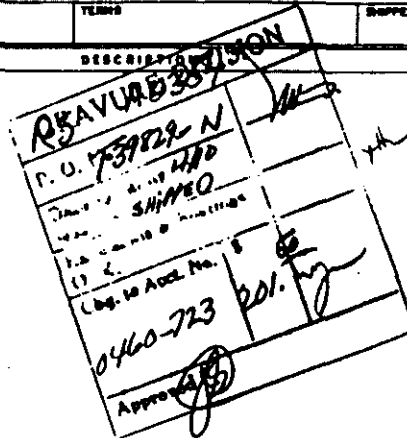
INVOICE NO.

INVOICE DATE

4/10/73

SHIPPED TO

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	P/P. OF C/L
31	31				
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
31	drums removed	6.50	201.5		



28476

TRIANGLE PUBLICATIONS, INC.

128476

ACCOUNT	CODE	DEPT.	LOC.	PR.	GROSS AMOUNT	DISCOUNT	NET AMOUNT	INVOICE DATE	REFERENCE
168	723	88			201.50	.00	201.50	4/10/73	INV 3026
					201.50				

DIVISION CODE: 1. DAILY RACING FORMS 2. SEVENTEEN (MIA PUBLICATIONS) 3. TV GUIDE - TELEVISION PUBLICATIONS
 2. RADIO AND TELEVISION 3. MEMORANDUM PRINTERS 11. SIGNATURE

TRIANGLE PUBLICATIONS, INC.

P.O. BOX 790
 RADNOR, PA. 19088

NO. 128476

11 1

PAY TO THE ORDER OF

JONAS WASTE REMOVAL
 BARKRIDGE RD.
 SEWELL N.J. 08080

PROVIDENT NATIONAL BANK

28

	NAME	PER.	DOC.	DATE
DISTRIBUTION				
CORRECTION				
AUDITED				
ADVICE TYPED		POSTED		
TEMPORARY CHECK REGISTER		RANGE		
CHECK REGISTER				

CODE				GROSS AMOUNT	DISCOUNT	NET AMOUNT	INVOICE DATE	REFERENCE
ACCOUNT	DEPT	LOC	PR					
460	723	00		305.50 305.50	.00	305.50	4/26/73	INV 3073
DIVISION CODE				2. DAILY RACING FORM 3. RADIO AND TELEVISION		5. SEVENTEEN TILA PUBLICATIONS 6. MEMORAT PRINTERS		7. TV GUIDE (TELEVISION PUBLICATIONS) 11. GRAVURE

TRIANGLE PUBLICATIONS, INC. P.O. BOX 799
RADNOR, PA. 19088

NO. 128942

DATE 5/26/73 NET AMOUNT 305.50

PAY TO THE ORDER OF JONAS WASTE REMOVAL
BARKRIDGE RD.
SEWELL N.J. 08080

PROVIDENT NATIONAL BANK
PHILADELPHIA, PA.

	NAME	PER	DOC	DATE
DISTRIBUTION				
CORRECTION				
AUDITED				
ADVICE TYPED		POSTED		
TEMPORARY CHECK REGISTER		CARGES		
PERMANENT CHECK REGISTER		AUDITED		

Jonas Waste Removal
DIVISION OF MARVIN JONAS, INC.
BARKRIDGE RD. - SEWELL, N. J. 08080
PHILA. (215) 8A 7-1118 - N. J. 1-609-468-6128

INVOICE NO. N° 3073

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431 N. 15th St.
Phila. Pa. 19130

RECEIVED INVOICE 4/26/73

MAY 12 1973

ACCOUNTING DEPT.

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPS OR COLL.	
QUANTITY	DESCRIPTION				PRICE	AMOUNT
47	Drums of waste removed				6.50	305.50

GRAVURE DIVISION

P. O. 1739129-N

Date 7-1-428

W. J. 4/28

Ex. 100-100

O. K.

(See. to file No. 5)

0460-723 305.50

Approved [Signature]

ACCOUNTS PAYABLE

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
 BARKRIDGE RD. - SEWELL, N. J. 08080
 PHILA. (215) SA 7-1118 - N. J. 1-609-468-8128

INVOICE
NO.

NO 3261

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TO

Triangle Publications
 431 N. 15th St.
 Phila.pa. 19130

RECEIVED

INVOICE
DATE
SHIPPED

6/12/73

JUN 19 1973

ACCOUNTING DEPT.

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPH OR COLL	
QUANTITY	DESCRIPTION				PRICE	AMOUNT
37	drums of sludge removed				6.50	240.50

GRAVURE DIVISION

P. O. NO. 731219-N

Date: 7/2/62

WAS: T. 2/62

460-723 240.50

APPROVED

14

GRAVURE DIVISION
 P. O. #731829-N
 DATE 6/12/73
 WAP
 460-723
 440.50
 mg

ACCOUNT				CODE	GROSS AMOUNT	DISCOUNT	NET AMOUNT	INVOICE DATE	REFERENCE
460	723	00			240.50			6/12/73	INV. 3261
					240.50	.00	240.50		

DIVISION CODE 1- EXECUTIVE 2- DAILY RACING FORM 11- GRAVURE

TRIANGLE PUBLICATIONS, INC.

P.O. BOX 720
 RADNOR, PA. 19086

NO. 132261

11-1

JONAS WASTE REMOVAL
 BARKRIDGE RD.
 SEWELL N.J. 08080

PAY
TO THE
ORDER
OF

PROVIDENT NATIONAL BANK

31

FILE
83073

	NAME	PER.	DOC	DATE
DISTRIBUTION				
COLLECTION				
ADVERT				
ADVICE TYPE		POSTED		
TEMPORARY CHECK REGISTER		HARDET		

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
BARKRIDGE RD. - SEWELL, N. J. 08080
PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

INVOICE NO. **Nº 1160**
 INVOICE DATE **April 4, 1970**

SOLD TO **Trigangle Publications**
440 N. Broad Sts.
Phila., Penna. 19101

SHIPPED TO

OUR ORDER NO.	YOUR ORDER NO. W0841	SALESMAN	TERMS	SHIPPED VIA	PPD OR C.O.												
QUANTITY	DESCRIPTION			PRICE	AMOUNT												
34	Sludge Drums removed			5.00	170.00												
<div>ACCOUNTS PAYABLE</div> <div><div>GRAYSON DIVISION</div><table><tr><td>INVOICE NO.</td><td></td></tr><tr><td>DATE</td><td></td></tr><tr><td>QUANTITY</td><td></td></tr><tr><td>UNIT PRICE</td><td></td></tr><tr><td>TOTAL</td><td></td></tr><tr><td>APPROVED</td><td></td></tr></table><div>Approved</div></div>						INVOICE NO.		DATE		QUANTITY		UNIT PRICE		TOTAL		APPROVED	
INVOICE NO.																	
DATE																	
QUANTITY																	
UNIT PRICE																	
TOTAL																	
APPROVED																	

APR 2

Nº 6292

SOLD TO Triangle Publications Inc.
440 N. Broad Sts.
Phila., Penna. 19101

**SHIPPED
TO**

33

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
SARKRIDGE RD. - SEWELL, N. J. 08080
PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

INVOICE NO. **1476** DEC 2 1970

INVOICE DATE **12/15/70**

SHIPPED TO

SOLD TO Triangle Publications
 Crayton Division
 431 N. 15th St.
 Phila. Pa. 19120

OUR ORDER NO.	YOUR ORDER NO. 1002	SALESMAN	TERMS	SHIPPED VIA	PPG. OR COLL.
QUANTITY	DESCRIPTION			PRICE	AMOUNT
20	sludge drums removed			5.00	145.00

GRAND TOTAL \$145.00

P.O. T-3053-N

ACCOUNTS PAYABLE

4/25/79

65

ACCOUNTS PAYABLE

GR: 1002-1118-4501
 P.O. T-3252-N
 12/15/70
 145.00
 60

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
 BARKRIDGE RD. - SEWELL, N. J. 08080
 PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

INVOICE NO. **Nº 1486**

INVOICE DATE **12/29/70**

SHIPPED TO

SOLD TO
 Triangle Publications
 Gravure Division
 431 N. 15th St.
 Phila. Pa. 19130

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPG. OR COLL.	
	1093					
QUANTITY	DESCRIPTION				PRICE	AMOUNT
16	sludge drums removed				5.00	80.00

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
 BARKRIDGE RD. - SEWELL, N. J. 08080
 PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

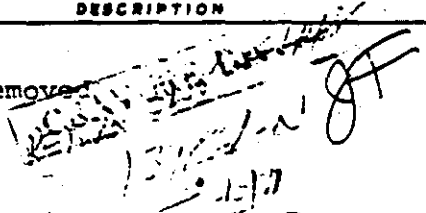
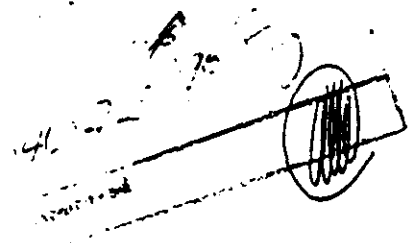
FEB 10 1971

INVOICE NO. **Nº 1525**

INVOICE DATE **2/3/71**

SOLD TO Triangle Publications
 Gravure Division
 431 N. 15th St. Phila. 19130

SHIPPED TO

OUR ORDER NO.	Y.J. JAGER NO. 1120	SALESMAN	TERMS	SHIPPED VIA	PPD. OR COL.	
QUANTITY	DESCRIPTION				PRICE	AMOUNT
19	sudge drums removed  				5.00	95.00

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
 BARKRIDGE RD. - SEWELL, N. J. 08080
 PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

MAR 10 1971

INVOICE NO. **Nº 1558**

INVOICE DATE **3/2/71**

SHIPPED TO

SOLD TO
 Triangle Publications
 Gravure Division
 431 N. 15th St.
 Phila. Pa. 19130

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPG. OR COLL.
	1137				
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
47	sludge drums removed	5.00	235.00		
8	M.T. drums for credit	1.00	- 8.00		
			227.00		

Handwritten notes and stamps:
 WUREN
 RETN
 3/2/71
 O. K.
 Chg. to 771
 0879-771
 227.00
(Signature)

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
BARKRIDGE RD. - SEWELL, N. J. 08080
PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

INVOICE
NO.

APR 21 1971
1607

INVOICE
DATE

4/14/71

SHIPPED
TO

SOLD
TO

Triangle Publications
 Gravure Division
 431 N. 15th St.
 Phila. Pa. 19130

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPG. OR COLL.
	1181				
QUANTITY	DESCRIPTION			PRICE	AMOUNT
22	sludge drums removed			6.50	143.0

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
 BARKRIDGE RD. - SEWELL, N. J. 08080
 PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

MAY 12 1971

INVOICE NO. **Nº 1632**

INVOICE DATE **5/4/71**

SHIPPED TO

SOLD TO Triangle Publications
 Gravure Division
 431 N. 15th St.
 Phila. Pa. 19130

OUR ORDER NO.	YOUR ORDER NO. 1192	SALESMAN	TERMS	SHIPPED VIA	PPG. OR COLL.
QUANTITY	DESCRIPTION			PRICE	AMOUNT
14	drums of waste removed			6.50	91.00
<div><div>GRAVURE DIVISION</div><div>P. O. No. 7-1118</div><div>Date of invoice was 5/4/71</div><div>Extensions & Postings O. K.</div><div>Chg. to Acct. No. \$</div><div>Approved <i>[Signature]</i></div></div>					

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
 BARKRIDGE RD. - SEWELL, N. J. 08080
 PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

JUL 1 1971

INVOICE NO. **Nº 1684**

INVOICE DATE **6/22/71**

SHIPPED TO

SOLD TO

Triangle Publications
 Gravure Division
 431 N. 15th St.
 Phila. Pa. 19130

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PRG. OR COLL.
	1225				
QUANTITY	DESCRIPTION			PRICE	AMOUNT
21	drums of sludge removed			6.50	136.50

GRAVURE DIVISION

P. O. No. ☒

Date ☒ Quantity ☒

Extensins & ☒

O. K. ☒

Chg. to acc. to. ☒

GRAVURE DIVISION

P. O. No. _____

Date (Quantity) _____

Wash No. _____

Estimate No. & Amount _____

O. K. _____

City, State & Zip _____

Approved _____

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
 BARKRIDGE RD. - SEWELL, N. J. 08080
 PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

INVOICE NO. **Nº 1746**

INVOICE DATE **8/24/71**

SHIPPED TO

SOLD TO
 Triangle Publications
 Gravure Division
 431 N. 15th St.
 Phila. Pa. 19130

SEP 8 1971

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPG. OR COLL.
	1884				
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
22	drums of sludge removed	6.50	143.00		

GRAVURE DIVISION

DATE: 8/24/71

TO: Triangle Publications

FROM: Jonas Waste Removal

AMOUNT: 143.00

APPROVED: [Signature]

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
 BARKRIDGE RD. - SEWELL, N. J. 08080
 PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

OCT 13 1971

INVOICE NO. **Nº 1791**

INVOICE DATE **10/8/71**

SOLD TO
 Triangle Publications
 Gravure Division
 431 N. 15th St.
 Phila. Pa. 19130

SHIPPED TO

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPG. OR COLL.
	1918				
QUANTIT.	DESCRIPTION			PRICE	AMOUNT
37	drums of sludge removed			6.50 7.00	240.50

GRAVURE DIVISION

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1

GRAVURE DIVISION

P. J. 10/10/71

Price 6.50

Qty 37

Subtotal 240.50

Approved *[Signature]*

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
 BARKRIDGE RD. - SEWELL, N. J. 08080
 PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

INVOICE NO. **Nº 1810**

INVOICE DATE **10/20/71**

SHIPPED TO

OCT 27 1971

SOLD TO

Triangle Publications
 Gravure Division
 431 N. 15th St.
 Phila. Pa. 19130

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPG. OR COLL.
	1230				
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
12	drums of sludge removed <i>RETURNED TO SENDER</i> <i>10/27/71</i> <i>Approved [Signature]</i>	6.50	78.00		

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
 BARKRIDGE RD. - SEWELL, N. J. 08080
 PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

SEP 23 1971

INVOICE NO. **Nº 1765**

INVOICE DATE **9/15/71**

SHIPPED TO

SOLD TO

Triangle Publishing
 431 N. 15th St.
 Phila. Pa. 19130

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPG. OR COLL.
	1900				
QUANTITY	DESCRIPTION			PRICE	AMOUNT
16	drums of sludge removed			6.50	104.00

Handwritten notes and signatures:
 Approved [Signature]
 10-1-71
 19

HARRIDGE RD. - SEWELL, N. J. 08080
PHILA. (215) SA 7-1110 - N. J. 1-609-488-6128

INVOICE NO. N^o 1684

INVOICE DATE 6/22/71

SHIPPED TO

SOLD TO

Triangle Publications
Gravure Division
431 N. 15th St.
Phila. Pa. 19130

ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPS OR COLL.	
	1225					
QUANTITY	DESCRIPTION				PRICE	AMOUNT
21	drums of sludge removed				6.50	136.50
<div>GRAVURE DIVISION #422</div> <div>P. O. No. 7-3997N</div> <div>Date Quantity 6/22/71</div> <div>was Rec'd</div> <div>Exterminator & Footings</div> <div>O. K.</div> <div>Chg. to Accl. No. 460-725</div> <div>Approved 12/2</div>						

BARKRIDGE RD. - SEWELL, N. J. 08088
 PHILA. (215) SA 7-1110 - N. J. 1-609-468-6120

INVOICE
 NO.

Nº 1746

INVOICE
 DATE

8/24/71

SHIPPED
 TO

SOLD
 TO

Triangle Publications
 Gravure Division
 431 N. 15th St.
 Phila. Pa. 19130

SEP 8 1971

IN ORDER NO.	TOTAL DIV. NO.	SALESMAN	TERMS	SHIPPED VIA	PPD OR COLL.
	1804				
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
22	lbs of sludge removed	6.50	143.00		
<div><div>GRAVURE DIVISION O. R. No. 1-39827C Date Quoted 8/24/71 as per extension of contract D. K. Chg. to Acct. No. 143.00 0460-723 Approved [Signature]</div></div>					

DIVISION OF MARVIN JONAS, INC.
BARKRIDGE RD. - SEWELL, N. J. 08080
PHILA. (215) SA 7-1118 - N. J. 1-609-488-8128

INVOICE NO. N^o 1810

INVOICE DATE 10/20/71

SHIPPED TO

OCT 27 1971

SOLD TO

Triangle Publications
Gravure Division
431 N. 15th St.
Phila. Pa. 19130

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPD OR COLL	
	1030					
QUANTITY	DESCRIPTION				PRICE	AMOUNT
12	drums of sludge removed				6.50	78.00
<div>RETURN SLIP 11/1/71 5334 P.O. NO. T-37,529-11 10/11/71 0400-783 75.00 Approved [Signature]</div> <div>EXHIBIT # 30 DATE 5-11-70 [Signature]</div>						

EXHIBIT # 30
DATE 5-21-74
MASTROIANI & FORMAROLI, INC.
CERTIFIED SHORTHAND REPORTERS

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
 BARKRIDGE RD. - SEWELL, N. J. 08080
 PHILA. (215) SA 7-1118 - N. J. 1-609-468-8128

SOLD TO Triangle Publications
 431 N. 15th St.
 Phila. Pa. 19130

INVOICE NO.

INVOICE DATE

SHIPPED TO

ACCOUNTING DEPT.

JAN 11 1973

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPD. OR CC	
QUANTITY	DESCRIPTION				PRICE	AMOUNT
40	drums of sludge removed				6.50	260.

SAVURE DIVISION 2

RETURN

P.O. 751021-11

DATE 1/13/23

Lib. to Acc. No. 5

0460-723 260.75 mg

Approved [Signature]

△ Voucher 122168

1

PAID VOUCHER DIVISION 2
 RETURN
 P. O. 751521-1
 1/13/73
 Lbs. to Acc. No. 3
 0460-723 260.75
 Approved

△ Voucher
 122168
 1

Jonas Waste Removal
 DIVISION OF MARVIN JONAS, INC.
 BARKRIDGE RD. - SEWELL, N. J. 08080
 PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

INVOICE
NO.

Nº 3296

INVOICE
DATE

6/19/73

SHIPPED
TO

SOLD
TO

Triangle Publications
 431 N. 15th St.
 Phila. Pa. 19130

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPG. OR COLL.
QUANTITY	DESCRIPTION			PRICE	AMOUNT
24	drums of waste removed			6.50	156.00

BRAYURE DIVISION
 P. O. No. 3296-N
 Date Quantity
 was Met 6/19
 Commission & Expenses
 Chg. to Acc. No. 156.
 0440-723
 (Signature)

12378

TRIANGLE PUBLICATIONS, INC.

132378

ACCOUNT	CODE	DEPT	LOC. - PR.	AMOUNT	DISCOUNT	NET AMOUNT	INVOICE DATE	REFERENCE
460	723	00		156.00			6/19/73	INV. 3296
				156.00	.00	156.00		

DIVISION CODE

1- EXECUTIVE

2- BAILY RACING FORM

11- BRAYURE

TRIANGLE PUBLICATIONS, INC.

P.O. BOX 730
RADNOR, PA. 19086

NO. 140911

3-8
310

11 1

PAY
TO THE
ORDER
OF

JONAS WASTE REMOVAL
BARKRIDGE ROAD
SEWELL, NEW JERSEY 08080

PROVIDENT NATIONAL BANK
PHILADELPHIA, PA.

DATE
122673

NET AMOUNT
\$234.00

	NAME	PER.	DOC	DATE
DISTRIBUTION				
CORRECTION				
AUDITED				
ADVICE TYPED		POSTED		
TEMPORARY CHECK REGISTER		BAROZ		11/19
REGULAR CHECK REGISTER		AUDITED		12/26

Jonas Waste Removal
DIVISION OF MARVIN JONAS, INC.
BARKRIDGE RD. - SEWELL, N. J. 08080
PHILA. (215) SA 7-1118 - N. J. 1-609-468-6128

Nº 4608

INVOICE
NO.

RECEIVED
DATE 11/19/73

SHIPPED NOV 21 1973

TO ACCOUNTING DEPT.

SOLD TO Triangle Publications
431 N. 15th St.
Phila., Pa. 19130

OUR ORDER NO.	YOUR ORDER NO.	SALESMAN	TERMS	SHIPPED VIA	PPS OR COLL.
QUANTITY	DESCRIPTION			PRICE	AMOUNT
36	sludge drums removed			6.50	234.00

shippers no. W 2948

RAYA 11/19/73

P. O. 739829-N

Date quantity was 11/19/73

Extension & Forwarding

O. K.

Chg. to Acct. No. 0460-723

234.00

Approved

- Triangle Robbers
Philly

3/1	39	1950	-	3/12	1972	H	Knickerbocker, Madison
3/15	19du	850	-	3/12	1972	H	Knickerbocker, Madison
3/15	31du	1550	-	3/12	1972	H	Knickerbocker, Madison
4/5	12du	600	-	3/12	1972	H	Knickerbocker, Madison
4/5	31du	1800	-	3/12	1972	H	Knickerbocker, Madison
4/5	31du	1800	-	3/12	1972	H	Knickerbocker, Madison
5/10	17du	850	-	3/12	1972	H	Knickerbocker, Madison
6/1	11du	550	-	3/12	1972	H	Knickerbocker, Madison
6/1	26du	1300	-	3/12	1972	H	Knickerbocker, Madison
6/1	19du	850	-	3/12	1972	H	Knickerbocker, Madison
6/1	26du	1300	-	3/12	1972	H	Knickerbocker, Madison
7/19	47du	2350	-	3/12	1972	H	Knickerbocker, Madison
8/9	58du	2900	-	3/12	1972	H	Knickerbocker, Madison
8/23	38du	1900	-	3/12	1972	H	Knickerbocker, Madison
9/13	38du	1,800	-	3/12	1972	H	Knickerbocker, Madison
10/11	48du	2,400	-	3/12	1972	H	Knickerbocker, Madison
10/25	53du	2,600	-	3/12	1972	H	Knickerbocker, Madison
11/15	41du	2,405	-	3/12	1972	H	Knickerbocker, Madison
11/30	20	1550	-	3/12	1972	H	Knickerbocker, Madison
12/30	42du	2130	-	3/12	1972	H	Knickerbocker, Madison

3.000 872 50ft. H Knickerbocker
3.500 872 50ft. H Knickerbocker

Truett Collection

26,895 gals 1972 gals - 4 Knickerbocker
 415 gals 376 gals - 4 Knickerbocker
 1655 gals 2555 gals

NO

1972

1/1/71	57 d	2850	—	1972	H Knickerbocker, M.L.
2/1/71 <td>64 d<td>3200<th>—</th><td>1972<th>H Knickerbocker, M.L.</th></td></td></td>	64 d <td>3200<th>—</th><td>1972<th>H Knickerbocker, M.L.</th></td></td>	3200 <th>—</th> <td>1972<th>H Knickerbocker, M.L.</th></td>	—	1972 <th>H Knickerbocker, M.L.</th>	H Knickerbocker, M.L.
3/1/71 <td>52 d<td>2600<th>—</th><td>1972<th>H Knickerbocker, M.L.</th></td></td></td>	52 d <td>2600<th>—</th><td>1972<th>H Knickerbocker, M.L.</th></td></td>	2600 <th>—</th> <td>1972<th>H Knickerbocker, M.L.</th></td>	—	1972 <th>H Knickerbocker, M.L.</th>	H Knickerbocker, M.L.
3/2/71 <td>48 d<td>2400<th>—</th><td>1972<th>H Knickerbocker</th></td></td></td>	48 d <td>2400<th>—</th><td>1972<th>H Knickerbocker</th></td></td>	2400 <th>—</th> <td>1972<th>H Knickerbocker</th></td>	—	1972 <th>H Knickerbocker</th>	H Knickerbocker
3/31 <td>43 d<td>2150<th>—</th><td>1972<th>H Knickerbocker, M.L.</th></td></td></td>	43 d <td>2150<th>—</th><td>1972<th>H Knickerbocker, M.L.</th></td></td>	2150 <th>—</th> <td>1972<th>H Knickerbocker, M.L.</th></td>	—	1972 <th>H Knickerbocker, M.L.</th>	H Knickerbocker, M.L.
5/9 <td>71 d<td>3550<th>—</th><td>1972<th>H Knickerbocker, M.L.</th></td></td></td>	71 d <td>3550<th>—</th><td>1972<th>H Knickerbocker, M.L.</th></td></td>	3550 <th>—</th> <td>1972<th>H Knickerbocker, M.L.</th></td>	—	1972 <th>H Knickerbocker, M.L.</th>	H Knickerbocker, M.L.
5/31 <td>49<td>2450<th>—</th><td>1972<th>H Knickerbocker, M.L.</th></td></td></td>	49 <td>2450<th>—</th><td>1972<th>H Knickerbocker, M.L.</th></td></td>	2450 <th>—</th> <td>1972<th>H Knickerbocker, M.L.</th></td>	—	1972 <th>H Knickerbocker, M.L.</th>	H Knickerbocker, M.L.
6/27 <td>20<td>1000<th>—</th><td>1972<th>H Knickerbocker</th></td></td></td>	20 <td>1000<th>—</th><td>1972<th>H Knickerbocker</th></td></td>	1000 <th>—</th> <td>1972<th>H Knickerbocker</th></td>	—	1972 <th>H Knickerbocker</th>	H Knickerbocker
7/4 <td>40 d<td>2000<th>—</th><td>1972<th>H Knickerbocker</th></td></td></td>	40 d <td>2000<th>—</th><td>1972<th>H Knickerbocker</th></td></td>	2000 <th>—</th> <td>1972<th>H Knickerbocker</th></td>	—	1972 <th>H Knickerbocker</th>	H Knickerbocker
7/25 <td>34 d<td>1700<th>—</th><td>1972<th>H Knickerbocker</th></td></td></td>	34 d <td>1700<th>—</th><td>1972<th>H Knickerbocker</th></td></td>	1700 <th>—</th> <td>1972<th>H Knickerbocker</th></td>	—	1972 <th>H Knickerbocker</th>	H Knickerbocker
8/15 <td>33 d<td>1650<th>—</th><td>1972<th>H Knickerbocker</th></td></td></td>	33 d <td>1650<th>—</th><td>1972<th>H Knickerbocker</th></td></td>	1650 <th>—</th> <td>1972<th>H Knickerbocker</th></td>	—	1972 <th>H Knickerbocker</th>	H Knickerbocker
9/2-2 <td>32 d<td>1600<th>—</th><td>1972<th>H Knickerbocker</th></td></td></td>	32 d <td>1600<th>—</th><td>1972<th>H Knickerbocker</th></td></td>	1600 <th>—</th> <td>1972<th>H Knickerbocker</th></td>	—	1972 <th>H Knickerbocker</th>	H Knickerbocker
9/19 <td>46 d<td>2300<th>—</th><td>1972<th>H Knickerbocker</th></td></td></td>	46 d <td>2300<th>—</th><td>1972<th>H Knickerbocker</th></td></td>	2300 <th>—</th> <td>1972<th>H Knickerbocker</th></td>	—	1972 <th>H Knickerbocker</th>	H Knickerbocker
9/30 <td>65 d<td>3250<th>—</th><td>1972<th>H Knickerbocker</th></td></td></td>	65 d <td>3250<th>—</th><td>1972<th>H Knickerbocker</th></td></td>	3250 <th>—</th> <td>1972<th>H Knickerbocker</th></td>	—	1972 <th>H Knickerbocker</th>	H Knickerbocker
10/31 <td>64 d<td>3200<th>—</th><td>1972<th>H Knickerbocker</th></td></td></td>	64 d <td>3200<th>—</th><td>1972<th>H Knickerbocker</th></td></td>	3200 <th>—</th> <td>1972<th>H Knickerbocker</th></td>	—	1972 <th>H Knickerbocker</th>	H Knickerbocker
11/7 <td>40 d<td>2000<th>—</th><td>1972<th>H Knickerbocker</th></td></td></td>	40 d <td>2000<th>—</th><td>1972<th>H Knickerbocker</th></td></td>	2000 <th>—</th> <td>1972<th>H Knickerbocker</th></td>	—	1972 <th>H Knickerbocker</th>	H Knickerbocker
11/21 <td>113 d<td>2100<th>—</th><td>1972<th>H Knickerbocker</th></td></td></td>	113 d <td>2100<th>—</th><td>1972<th>H Knickerbocker</th></td></td>	2100 <th>—</th> <td>1972<th>H Knickerbocker</th></td>	—	1972 <th>H Knickerbocker</th>	H Knickerbocker
12/11 <td>60 d<td>3000<th>—</th><td>1972<th>H Knickerbocker</th></td></td></td>	60 d <td>3000<th>—</th><td>1972<th>H Knickerbocker</th></td></td>	3000 <th>—</th> <td>1972<th>H Knickerbocker</th></td>	—	1972 <th>H Knickerbocker</th>	H Knickerbocker
12/11 <td>60 d<td>3000<th>—</th><td>1972<th>H Knickerbocker</th></td></td></td>	60 d <td>3000<th>—</th><td>1972<th>H Knickerbocker</th></td></td>	3000 <th>—</th> <td>1972<th>H Knickerbocker</th></td>	—	1972 <th>H Knickerbocker</th>	H Knickerbocker

4545C gals

1972 gals

4545C - 4545C - 4545C

914X55 = 50,270

Triangle Publications

NR

Date Cont.	Gallons	Material	Disposal Site
1/10 35 dr	1750	1972 Ink	H. Krechebuck
3/11 6 dr	10 2400	21/71 Ink	Kyron
3/11 6 dr	700	3/76 Ink	All County
3/11 700	5	Stent	
4/11 43 dr	112 177	21/71 Ink	H. Krechebuck
4/11 18 dr	900	3/76 Ink	All County
5/15 43 dr	1500	5/76 Ink	Wolf
5/31 72 dr	2100	1972 Ink	Krechebuck
6/20 52 dr	1000	Ink 4-72	Krechebuck
7/31 55 dr	1500	Ink water	Krechebuck
19/12 Ink	7650		Krechebuck
3/76 Salub	1600		Alp Co
21/71	1500		wet
	10 c/y		goron
	11 c/y		Krechebuck

Exhibit D

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 CIVIL ACTION NO. 84-0152

4 STATE OF NEW JERSEY,
5 DEPARTMENT OF ENVIRONMENTAL
6 PROTECTION,

7 Plaintiff,

8 vs.

9 GLOUCESTER ENVIRONMENTAL
10 MANAGEMENT SERVICES, INC., et als.,

11 Defendants.

12 -----
13 June 9, 1987
14 -----

15 Oral sworn deposition of David Bumbaugh, 133
16 Spilt Rock Road, Browns Mills, New Jersey, taken in
17 law offices of Archer & Greiner, Esquires, One
18 Centennial Square, Haddonfield, New Jersey, before
19 David J. Bateman, Certified Shorthand Reporter and
20 Notary Public of the State of New Jersey, on the
21 above date, commencing at 11:00 A.M., there being
22 present:

23 MARTY M. JUDGE, ESQUIRE,
24 Deputy Attorney General
25 Attorney for Plaintiff.

ARCHER & GREINER, ESQUIRES,
BY: CHRISTOPHER R. GIBSON, ESQUIRE,
Attorneys for Defendants Morton-Thioko
and Certainteed

SCHUENEMANN, GERCKE & DUMSER, ESQUIRES,
BY: STEVEN E. FELD, ESQUIRE,
Attorneys for Defendant Modern Way
Refuse

CRUMMY, DELDEO, DOLAN, GRIFFINGER
& VECCHIONE, ESQUIRES.

1 Q Thiokol Chemical Corp in Trenton, New Jersey?

2 A That could be the place with the railroad
3 tracks behind it.

4 Q Again, you can't really describe the location
5 of that place any better than saying it's near some
6 railroad tracks?

7 A If I was there I could tell you, but going
8 back as far as you are trying to make me go back,
9 you are going to get a few things that are mixed up.

10 Q What about Total Disposal in Philadelphia?

11 A No.

12 Q Trash Removers or Toxic Waste Removers?

13 A No.

14 Q Trenton Fiber Drum Company in Trenton?

15 A We use to sell them drums, but that wasn't a
16 dealing that I had with them when I worked with Mr.
17 Jonas.

18 Q Triangle Publications?

19 A Yes.

20 Q What dealings did Jonas have with Triangle?

21 A Full and empty drums.

22 Q Did you yourself ever haul full drums from
23 Triangle?

24 A Yes, but I want to make sure it's the right
25 place, that's the problem. I remember Triangle

1 Publications, I use to go there like every other
2 month. It was pretty regular. I didn't really pick
3 up a lot of stuff there. It was a small holding
4 area they had. It was only like two or three, four
5 drums of waste at a time, and maybe 30 or 40 drums.

6 Q What do you mean two to four drums at a time?
7 30 to 40 total that you ever picked up there, is
8 that what you are saying?

9 A No, no. The times I went there they only had
10 like two, three, four full drums and maybe 30, 40
11 empty. I think they use to make the TV Guide.

12 Q For how long of a period of time did you go
13 there every other month?

14 A Couple years.

15 Q Do you know what kind of waste you hauled
16 from there?

17 A It was a solvent waste. It was basically a
18 cleaning solvent.

19 Q Did you ever see that waste?

20 A Yes.

21 Q What did it look like?

22 A Dirty solvent, black, different colors.

23 Q Can you tell us about the colors? You said
24 black.

25 A Just gray. It looked like they used it to

1 clean ink off whatever they did, I guess their
2 printing rollers and stuff like that.

3 Q Can you describe it's consistency?

4 A Very light liquid. Definitely a solvent.

5 MS. BARNETT: Did it have a
6 distinctive odor or smell?

7 THE WITNESS: Like a solvent when you
8 clean your paint brushes and stuff.

9 MS. BARNETT: Did it smell flammable?

10 THE WITNESS: Oh, sure.

11 MR. BARNETT: I request you describe
12 what flammable smells like.

13 THE WITNESS: Well, it is kind of
14 hard, but if you paint cars, you can like --
15 you just -- you can smell it's flammable. It
16 is hard to describe it.

17 MS. BARNETT: Do all solvents smell
18 flammable to you?

19 MR. JUDGE: Objection to form.

20 MS. BARNETT: Do all solvents smell
21 flammable to you?

22 THE WITNESS: No, just the
23 generalization of them. I deal with a lot of
24 solvents from being mechanical, cleaning
25 parts, being in the drum area, the thinners,

1 and being to all these different companies.

2 MS. BARNETT: Does each solvent have
3 a distinctive smell?

4 THE WITNESS: Some of them do. Like
5 MEK, you can spot that far away. Like
6 Xylene and toluene, that has a distinctive
7 smell. Xylene isn't distinctive. A lot of
8 denatured alcohols and stuff like that. For
9 instance, you know what alcohol smells like,
10 you know, or Witch Hazel or something like
11 that.

12 MS. BARNETT: Thank you.

13 BY MS. LeBEAD:

14 Q Do you know the names of other drivers that
15 use to go to Triangle Publications and pick up
16 waste?

17 A When I was with Marvin I was pretty much the
18 only one because I went there in a straight truck.

19 Q Can you tell us anything about -- anything
20 other than what you have told us about that waste?

21 A No.

22 Q Tyco Industries in Moorestown?

23 A No, I can't tell you nothing about that.

24 Q Tyndale Company in Gloucester City, New
25 Jersey?